



State of Arkansas
Department of

WORKFORCE SERVICES

"America's Workforce Network"
www.arkansas.gov/esd

Mike Huckabee
Governor

Artee Williams
Director

Post Office Box 2981 • Little Rock, AR 72203-2981

**Department of Workforce Services
and
Arkansas Workforce Investment Board Issuance PY 05-15**

From: Artee Williams, Director
Sandra Winston, Executive Director

Date: May 31, 2006, 2006

Subject: Arkansas Workforce Investment Act Title I-B Program and Financial Monitoring Instrument with Monitoring and Oversight procedures

1. **Purpose:** To distribute a copy of the State's revised Program and Financial Monitoring Instrument and Monitoring and Oversight Procedures to the Local Workforce Investment Areas and Service Providers.
2. **Information:** The primary purpose of monitoring is to ensure that all legal, contractual and policy requirements of specific funding sources are met. A secondary purpose is to identify and call attention to questionable activities and conditions which appear to diminish opportunities for achieving the intent of the WIA or other funding sources, though not necessarily in violation of specific requirements.

The Department of Workforce Services (DWS) has revised its Program and Financial Monitoring Instrument and Monitoring and Oversight Procedures. These documents will be used as a guide to collect sufficient data to review all Agency funded grants and activities and analyze how services are provided within the local Workforce Centers/One-Stops. These guidelines are also intended to assist in determining how well local areas are implementing grant principles, as well as determining whether there are compliance issues in respect to each of the funding sources.

The attached procedures set forth the guidelines by which the DWS/Office of Monitoring And Compliance (OMAC), as the State or State staff, and as the Governor's Grant Recipient and Administrative Entity, will monitor all Agency funded grant program, financial and operational activities.

The State staff and/or its contractor(s) will generally use these procedures along with other issued policies and guidelines to perform monitoring and oversight activities.

-Over-

3. **Action Required:** This Issuance and attachments are effective as of the date of this Issuance. Please advise appropriate staff and/or contractors of the content of this Issuance and attachments.
4. **For Additional Information:** Contact the Office of Monitoring and Compliance (OMAC), Ms. Idell Moseley at (501) 682-3425 or Idell.Moseley@Arkansas.Gov.
5. **Attachments:** Arkansas Program and Financial Monitoring Instrument and Monitoring and Oversight Procedures.
6. **Expiration Date:** Continuing.

ARKANSAS'

MONITORING AND OVERSIGHT PROCEDURES

- I. **INTRODUCTION AND GENERAL INFORMATION:** These procedures set forth the guidelines by which the Department of Workforce Services (DWS), Office of Monitoring And Compliance (OMAC), as the State or State staff, and as the Governor's Grant Recipient and Administrative Entity, will monitor all Agency funded grant program, financial and operational activities. The Federal Regulations governing the Workforce Investment Act (WIA) activities authorize and require that the Governor be responsible for oversight of all Local Workforce Investment Area (LWIA) grant recipients and Title I programs. Also, guidelines and other specific regulations, from other funding sources, may require monitoring and oversight by the grantee or administrative agency responsible for the various funds.

The State staff developed the following Arkansas Monitoring Procedures specifically for the Workforce Investment Act (WIA) funds. However, these procedures may also be used as guidelines to monitor other activities. The State staff and/or its contractor will generally use these procedures along with other issued policies and guidelines to perform monitoring and oversight activities.

- II. **PURPOSE:** The primary purpose of monitoring is to ensure that all legal, contractual and policy requirements of specific funding sources are met. A secondary purpose is to identify and call attention to questionable activities and conditions which appear to diminish opportunities for achieving the intent of the WIA or other funding sources, though not necessarily in violation of specific requirements.

- III. **SELF-MONITORING BY RECIPIENTS/SUBRECIPIENTS:** All entities receiving WIA funds are required to have and follow adequate written procedures for monitoring all activities for which it receives Agency funds.

The monitoring procedures of the WIA grant recipients and subrecipients which adopt the same procedures contained herein are automatically approved by the State staff as adequate. For those entities who elect to adopt less than the entire monitoring procedures set forth in Item VI, the State staff will determine, during its normal monitoring process, whether the local procedures for these entities are adequate.

If the procedures as described in Item I of Part VI are not adopted, or if they are modified, the procedures adopted and used for monitoring must include, at a minimum, the following information:

- A. Designation of specific staff to perform monitoring
- B. Description of Monitoring Scope
- C. Monitoring Schedules
- D. Program Monitoring

- E. Financial Monitoring
- F. EEO Monitoring
- G. Property Control
- H. Monitoring Instruments
- I. Monitoring Reports
- J. Corrective Action, Responses, & Closeouts
- K. Administrative and Contract Monitoring
- L. Documentation of Internal/Self Monitoring
- M. Follow-Up

IV. **MONITORING OF SUBRECIPIENTS:** The State staff, Office of Monitoring And Compliance (OMAC) Unit, has been designated to monitor WIA and other Department of Workforce Services (DWS) activities for which the Governor or DWS is responsible. Circumstances may occur which compel alteration of procedures. For example, unannounced monitoring may be necessary under certain conditions. However, the State staff will generally adhere to the following procedures.

V. **DOCUMENTATION REQUIREMENTS**

- A. The following documents are required at the Administrative Entity (AE) level to accomplish the State's monitoring effort and should be kept in the participant's file. (Optional documents are designated where appropriate.)
 - 1. Signed Agency Application - Optional
 - 2. Job Description - Applicable to OJT, Work Experience, Customized Training, and Summer Youth. The job description should be included either in the OJT agreement, or in the work-site agreement for the other components.
 - 3. Personnel Policy Statement
 - 4. Benefits and Working Conditions Statement
 - 5. Grievance Procedure Statement
 - 6. Hatch Act
 - 7. Applicable AWIS data including eligibility support documentation
 - 8. Thirty (30) Days Review - Optional unless stipulated by the LWIA training plan or the subgrant narrative. The State staff recommend that this checkpoint be incorporated into internal procedures as a safeguard against ineligibles. The Thirty (30) Days Review form should be devised by the AE.
- B. It is recommended that the following required documents be maintained within the Fiscal Department:

1. Time and attendance records signed by the participants and the immediate supervisor/instructor; and
 2. W-4 Forms - Applicable to participants receiving monetary compensation.
- C. It is recommended that the following documents be maintained within the grantee management files:
1. List of current worksites;
 2. Worksite Agreements; and
 3. List of other funding sources.

VI. ARKANSAS MONITORING PROCEDURES

- A. Decide the tools to use and who will monitor
- B. The monitoring agency will determine the review emphasis prior to monitoring
- C. The monitoring agency will select a relevant written monitoring instrument and determine its appropriateness
- D. The monitoring agency will notify the monitored entity of the review emphasis and ensure the monitored entity has a copy of the monitoring instrument at least two (2) weeks in advance
- E. Other tools will be used as appropriate. Examples include:
1. Monitored Entity's file
 2. Previous monitoring reports
 3. Letters of concern/correspondence
 4. Other pertinent information from the file
 5. LWIA Workforce Plan
 6. LWIA Subgrant
 7. MIS
 8. Wage file
 9. Program status reports or Other reports as appropriate
 10. WIA Issuances
 11. State issued policies/directives
 12. DOL compliance review guides and other appropriate DOL material
 13. Workforce Investment Act
 14. Applicable OMB Circulars
 15. Follow-up reports
 16. Time cards
 17. Internal monitoring reports
 18. LWIB information
 19. Cooperative Agreements, if applicable
 20. Contracts/subgrants
 21. Financial reports
 22. Other pertinent material
- F. The following entities will conduct compliance reviews:
1. Grantors/Contractors will monitor themselves and grantees/subcontractors;

2. Agencies will monitor the provision of services affecting their participants agreed to in their financial and non-financial written agreements; and
3. Contracts/grants/written agreements will be the basis of monitoring.

VII. SCHEDULE MONITORING

- A. The individual responsible for the monitoring process will establish a general timeframe for monitoring and make monitoring assignments.
- B. By telephone, the assigned monitor will establish with the entity to be monitored a definite date and time for monitoring. The monitored entity will be informed at this time of the financial, program areas to be monitored, and the instrument that will be used to guide the monitoring process.
- C. As a courtesy, the monitor will try to provide a two (2) week advance notice of the monitoring visit. If possible, a letter will be sent at least two (2) weeks in advance to the entity to be monitored verifying the information discussed by telephone and referencing the monitoring instrument and the process to be used, including the FOI provisions. If the monitored entity does not have a copy of the instrument and procedures, the monitor will enclose a copy with his/her letter.
 1. The letter also will say what monitoring instrument will be used and will say where a copy may be found (please refer to Employment Assistance Issuance PY 01-9). If the monitored entity does not have a copy, the monitor will enclose a copy with the letter.
 2. The monitor will provide a tentative monitoring schedule, including the planned departure time and planned exit conference date.
 3. The monitor will determine ahead of time how much time will be needed for the review. In the letter, he/she will provide a tentative schedule to include:
 - a. a reminder of the date and time for the entrance conference;
 - b. the planned start and end day for each of the major review areas (e. g., participant records, financial systems, EEO, etc.);
 - c. the planned days for field visits and the types of field visits that will be conducted (e.g., OJT employers, summer work and training sites, etc.);
 - d. the anticipated date field work will be completed; and
 - e. the planned date and time for the exit conference.
 4. The monitor will note in the letter that these times are subject to change if the progress of the review is different from what is expected and says that he/she will keep the monitored entity aware of possible changes.
 5. In the letter, the monitor will list the types of files he/she will need to review. This will vary depending on the focus of the monitoring and could include such descriptions as participant files, OJT files, complaint files, personnel files, etc

VIII. CONDUCT THE DESK REVIEW AND PREPARE FOR MONITORING

- A. The monitor will review the grant, plan, and all modifications of the entity to be monitored for comparison during on-site review. He/she will:

1. Note target groups, kinds of activities, supportive services to be provided, including needs-based payments plan
 2. If provided, services to non-residents, etc.; and
 3. Note methods for determining demand occupations, length of training, eligibility/verification, assessment/remediation, identification/selection of participants, youth competencies, etc.
- B. The monitor will review monitored entity files to compare with information on-site. Some specific areas to review include:
1. Correspondence - note general questions, problems/ solutions, waivers, etc.;
 2. LWIB and Board information - minutes, by-laws, current list of members, disclosure statements of board members, appointments/vacancies notification, etc.;
 3. Monthly financial reports - note expenditure rates, timeliness, cost categories' expenditures;
 4. Resource files - note items to be looked at during monitoring;
 5. Financial and non-financial agreements - note activities;
 6. Recent monitoring reports - note corrective action required for follow-up verification; and
 7. Last audit report - note corrective action required for follow-up verification.
 8. As appropriate, review reports and files in the Management Information System for the monitored entity. Specific areas to look at include:
 9. Program status summary to determine sample size for reviewing participant files;
 10. Enrollment list to select participant files for review;
 11. Activity reports to determine if any participants have been inactive or received no WIA service for more than ninety (90) days;
 12. Wage report to select files for review; and
 13. Exit list to select files for review,
 14. Verify placement and training relatedness
 15. Review appropriate files for special emphasis areas.

IX. CONDUCT THE ENTRANCE INTERVIEW

- A. The Reviewer will prepare for the entrance conference prior to the on-site visit
- B. The Reviewer will inform the entity of any assistance he/she will have or need from other State or Local Area staff during the on-site review
- C. The Reviewer will brief the monitored entity on the scope of the monitoring
- D. The Reviewer will provide an overview of the information provided to the monitored entity in the letter sent by the monitor in advance, covering the following:
 1. Say what monitoring instrument will be used
 2. Review the list of needed documents and files

3. State the types and anticipated number of people planned to be interviewed (e.g., staff, subrecipients, participants, council or board members, etc.).
- E. The reviewer will provide a copy of written procedures for monitoring, including the process described in this document (if not previously provided)
- F. The reviewer will provide detailed information regarding the overall review process, including what will be covered/reviewed, the timeframe for the review, work and training site visits, etc.
- G. The reviewer will provide a list of documents and files and/or types of documents and files needed for review and the general methodology that will be used to draw samples.
- H. If the monitor knows in advance there are specific files he/she wants to see, these may be noted in the letter (e.g., all classroom training slot-in agreement files, the file for procurement of the monitored entity's office space, etc.), or provided during the entrance interview.
- I. The monitor will state the general methodology which will be used to draw samples for review (e.g., a random sample of participant files, the five largest OJT subcontractors' files, a 100% sample of capital expenditure procurement files, etc.).
- J. During the entrance interview, the monitored entity will be provided an opportunity to prepare the documents requested during the entrance conference, such as:
 1. Subgrants, contracts, or other pertinent grant documents
 2. The monitored entity will provide a list of its contracts and training sites - prior to the entrance conference the monitored entity should prepare a printout or list of current contracts and training sites which will be given to the monitor at the entrance conference so that the monitor can make a preliminary list of sites intended for visit – to include, by county and type of activity:
 - a. The training site name, street address, telephone number, contact person, amount of funds, and number of participants
 - b. The contact person should be someone who will be generally available during the review, and if possible, be located near the training or work site
 - c. If the monitor discovers any work/training sites that are not on the list, these will most likely be visited
- K. An overall contact person will be designated by the monitored entity. This may be the Director or someone else, but it is to be the person to whom general questions may be addressed and the person who should be notified if any serious problems are discovered. This may be two people, one for general questions and one for serious problems. Generally, the person(s) must be available during the review.

- L. The monitored entity will designate a contact person for each specific area or item to be reviewed (e.g., participant records, financial systems, funding streams, operational items, etc.). These must be in writing to avoid confusion.
- M. The monitored entity will identify the working space(s) for the monitor(s), and tell the monitor during the entrance conference where that space is located. The working area will allow ample space and be conveniently located to the files and/or the contact person, if possible.
- N. The monitored entity will provide internal procedures for file maintenance and control. (Note: This does not restrict the monitor from looking at any and all records.) Internal procedures should include the location of official files, including, but not limited to the following:
 - 1. The monitored entity will have available to provide to the monitor at the entrance conference a copy of its internal procedures for file maintenance and control, if any.
 - 2. The monitored entity will be prepared to supplement its written internal file maintenance and control procedures with oral information to be provided at the entrance conference if it wishes the monitor to access records in a specific way.
- O. The entrance conference/meeting is subject to FOI. The monitor will remind the group assembled, at the beginning of the entrance conference, that the meeting is subject to FOI if the following occurs:
 - 1. If more than one (1) LWIB member or more than one (1) CEO or more than one (1) other member of a covered board is present, the monitored entity will provide the monitor a copy of the media notification. If notification has not been made or documented, the entrance conference will be postponed and will be scheduled for a time that is at least two (2) hours after the last of the appropriate parties can be notified.
 - 2. If it is obvious following introductions that FOI provisions will not be violated because fewer than two (2) LWIB members or CEOs or members of other bodies covered by FOI are present, this step may be omitted.
- P. The monitored entity will let those to be interviewed know and ensure their availability or, if one or more cannot be available, will let the Reviewer know ASAP so that other arrangements may be made.
- Q. The Reviewer will mention items of concern or primary focus.
- R. The Reviewer will analyze findings and concerns from the monitored entity's most recent audit(s) and monitoring report(s). He/she will explain that he/she will be reviewing documentation to see that all cited findings and concerns, and especially those that were left unresolved pending additional review, have been corrected.
- S. The Reviewer will state that the rest of the review is general or, if it is not, what will be the impetus for the review (e.g., the Reviewer will look at procurement procedures as a result of a nationwide initiative and the report stating that the resolution will be provided to DOL; the Reviewer's agency has noted that the

monitored entity is having problems with financial reports so is reviewing the financial system to see what the problems are so they can be corrected, etc.).

- T. The monitored entity will describe current program operations, contracts, activities, etc.
- U. The monitored entity will describe how it is organized; the objectives of its major programs, including:
 - 1. What kinds of contracts it has and the activities it conducts;
 - 2. Who the major contractors and service providers are;
 - 3. Any contracts or services or programs that are particularly relevant to the focus of the monitoring.
- V. Any other information that the monitored entity believes would be helpful to the monitor, or about which the monitor asks, in order to ensure that the monitor understands the major orientation of the monitored entity's programs so that the reviews will be focused appropriately to reduce misunderstandings.
- W. The Reviewer and the monitored entity will discuss how problem areas will be communicated during the on-site review and to what organizational level.
 - 1. The monitor will state that he/she will tell the person he/she is working with immediately (e.g., for files, as soon as the file has been reviewed) if he/she cannot find a document, the Reviewer and monitored entity director or designated representative will discuss and agree upon whether problems will be communicated at the end of each day, at the end of the review of each section, or at some longer interval (e.g., not until exit conference).
 - 2. In general, this will be at the monitored entity's discretion unless it would create undue hardship on the Reviewer, such as causing two conferences within a few hours when the monitor is not in the office. Such communication also may be made by telephone if the Reviewer is not in the office.
- X. The Reviewer will report major problems to the monitored entity as soon as they are evident (meaning that some review or investigation has taken place first to determine whether a problem:
 - 1. Does exist) rather than waiting for the agreed upon communication schedule.
 - 2. Depending on the nature of the problem, it may also require the monitor to discuss it with his/her supervisor before reporting it, or instead of reporting it to the monitored entity.
 - 3. The monitor will explain how on-the-spot corrections will be handled in the report.
- Y. If problems that are minor, isolated and do not indicate a trend, they can be corrected on the spot as long as the staff appears to understand why the condition is a problem and how it is to be avoided in the future. The problems may not be noted in the monitoring report.

- Z. Such problems that involve issues of non-compliance will be noted in the report, but the report also will state that the monitored entity corrected the problem on the spot and no additional corrective action is necessary.
- AA. Such problems that do not involve issues of non-compliance will be covered through informal discussion between the Reviewer and the appropriate monitored entity contact person. Depending on the seriousness of such a problem, the Reviewer also may provide a copy of his/her exit conference notes referencing the problem or may write a separate letter to the monitored entity about the problem.
- BB. The Reviewer will inform the monitored entity that the Director or designee will be notified promptly of any serious items.
 - 1. The monitor will explain that if a serious problem is identified, the problem will be immediately discussed with the monitored entity's Director.
 - 2. Depending on the nature of the problem, the monitor may first call the monitor's supervisor and together they will determine the next appropriate notification.
- CC. The Reviewer will describe the process of the Exit Conference and what will happen with the written report. It will be explained that:
 - 1. All potential findings will be discussed at the Exit Conference;
 - 2. That the monitored entity will be given an opportunity to discuss any potential findings or ask questions;
 - 3. It may be necessary for the monitor to review potential findings:
 - a. with his/her supervisor or
 - b. to gather more information at his/her office or
 - c. conduct follow-up field work but prior to the exit conference.
- DD. While all potential findings will be discussed at the exit conference, it may be that some items discussed at the exit conference do not end up being noted as findings in the monitoring report.
- EE. The report will require that the monitored entity provide corrective action, if necessary, and will include a response due date.
- FF. The Reviewer will ask if there are any particular areas of concern that the monitored entity wishes to discuss.
- GG. The monitored entity will tell the Reviewer if there are any areas the monitored entity would like the monitor especially to review.
- HH. If the monitored entity director or other officials wish the monitor to pay particular attention to some area or program, the director or official may wish to make his/her request outside the entrance conference, depending on the nature of the concern.
- II. The monitor will discuss special requests with his/her supervisor to determine whether and how they will be handled.

JJ. The Reviewer invites questions.

1. Questions are encouraged during the entrance conference or as they arise during the monitoring.
2. Monitors will discuss procedural and technical questions relating to what they are doing and how at any time, but philosophical and policy questions should be raised with the monitor's supervisor or other appropriate person in the monitoring agency's structure.

KK. The monitor and monitored entity will prepare for the monitoring to begin.

1. The monitored entity will introduce its staff to the Reviewer.
2. Upon completion of the entrance conference the program director will give the monitor(s) a current organization chart which:
 - a. identifies the basic responsibilities of each staff person; and
 - b. identifies the name of each person occupying a position on the chart.
3. The monitored entity director or a person designated by the director will guide a tour of the central office and introduce the monitor to staff persons.
4. The monitored entity will show the monitor his/her work space.

X. CONDUCT ON-SITE MONITORING - IN THE MONITORED ENTITY'S OFFICES

A. The Reviewer and monitored entity will receive or provide the records requested during the entrance conference.

B. Two (2) workdays before site visits begin, the Reviewer will provide a tentative schedule of on-the-job training sites that will be visited to the staff of the monitored entity.

1. The schedule will not list specific times but will list each day by morning and afternoon and the sites scheduled during those periods of times.
2. The staff of the monitored entity will determine which OJT or customized training operators, if any, need to be notified in advance due to security or management scheduling concerns and will call each OJT and customized training site to advise them of the impending visit by the monitor and request that the appropriate staff be available for the monitor's visit.
3. It is not required that training sites other than OJT and customized training sites be scheduled precisely or be notified of times when the monitor will be there. The monitor will, however, tell the monitored entity two (2) days before site visits begin which days he/she intends to be in which counties/areas of the monitored entity's operation.
4. The monitored entity may send one of its staff with the Reviewer as long as that individual was not involved in negotiating or managing the contract or agreement.

5. If during the on-site visits the monitor determines that he/she will not be able to maintain the schedule, the staff of the monitored entity should be notified and they, in turn, should notify the pre-scheduled OJT or customized training sites.
- C. The monitored entity will provide the monitor with all files and documents requested during the entrance conference. Records for the area to be reviewed first should be available as soon as possible following the entrance conference.
 - D. If, during the monitoring process, questions are identified that require visits to additional OJT and customized training sites, the monitor will notify the monitored entity in writing what additional sites will be visited unless the reason relates to possible serious wrong doing by the monitored entity itself, in which case, the monitor will consult with his/her supervisor to determine appropriate notification procedures.
 - E. The monitor will use the review instrument and previous audit and monitoring findings and concerns as the basis for monitoring.
 - F. The monitor will review records.
 1. Using the list provided during the entrance conference and the internal file maintenance procedures, the monitored entity either will pull the requested records or will advise the monitor where the records and/or files are located, except that this will not preclude the monitor's access to records, as provided at 29 CFR Section 667.410 (b)(1)(2) and P.L. 105-220, Section 184 (a)(4).
 2. If the monitored entity pulls the records it will be done in a timely manner so that records are immediately available to the monitor.
 3. If the monitor is responsible for pulling the documents, only those records that will be reviewed should be taken from the files and only as needed. The monitor should take care to return records and/or files as soon as he/she is finished with them.
 4. Under no circumstances will the monitor take records and/or documents out of the offices of the monitored entity. If it is necessary to have documents available for work outside of the office, the monitor will make photocopies or request that the monitored entity staff makes photocopies of the documents.
 5. When the monitor is finished with the records, they will be returned to the monitored entity to be refiled. Under no circumstances will the monitor return records and/or documents directly to the files.
 6. The monitor will make notes on the review instrument.
 7. The review instrument that has been provided to the monitored entity will be the guide for reviewing the records.
 8. The monitor will ensure that the records/files for every item covered by the monitoring instrument are reviewed. The monitor will write notes and/or check a block for each item on the review instrument and must have a finding or an explanation on the review instrument for every problem area noted.
 9. If, while reviewing the items on the monitoring instrument, the monitor finds evidence of problems that are not covered by the instrument, the monitor will look beyond the areas covered in the instrument.

10. The monitor will discuss and clarify potential findings and concerns.
11. The monitor will make copies of appropriate documents.
12. The monitor will make copies of documents when necessary to provide support to his/her observations.
13. The monitor will make notes to the extent possible to avoid excessive copying. The monitor will check in-house files for copies already on hand and then compare them to the copies at the monitored entity's site to ensure the monitoring agency's copies are current.
14. The monitor will request clarification or discuss potential problems.
15. The monitor will request clarification from the designated contact person if more information is needed, or, if necessary information cannot be found or other problems exist which are probable findings.
16. The designated contact person will provide clarification or additional information when the question is raised or within a reasonable period of time.
17. If problems still exist after clarification or additional information has been requested from the designated contact person, the monitor will discuss potential findings with the next designated level within the monitored entity prior to the exit conference.
18. The designated person at the next level within the monitored entity will have the opportunity to investigate the problem further and to provide additional information or documentation to the monitor for his/her review prior to the exit conference.
19. The monitor will expand the samples as necessary.
20. Several situations may arise which cause monitors to expand sample sizes.
21. Unexpected external factors may affect monitoring plans. Illness, accidents, higher priorities and other emergencies affecting either monitors, monitored entities or training sites may necessitate alteration of schedules, itineraries and even the relevancy of pre-selected samples.
22. When conditions or activities are observed which indicate need for further review, sample sizes may be expanded. For example, occasionally a problem is found which may indicate the need to determine whether it is merely an isolated "human error" or is a pervasive, systemic failure.
23. Should it become necessary to expand sample sizes, the reasons for and possible need to do so will be explained to the staff designated by the monitored entity; unless, the reason relates to possible serious wrong doing by the monitored entity itself, in which case, the monitor will consult with his/her supervisor to determine appropriate notification procedures.

XI. CONDUCT ON-SITE MONITORING - MONITORING AT TRAINING SITES

- A. Upon arrival, the monitor will introduce himself/herself to the contact person previously identified by monitored entity. If the contact person (or alternates) is/are unavailable, the monitor will contact the supervisor(s) of participants. If after reasonable effort is made, neither a contact person nor supervisor can be found, the monitor will interview participants and the monitored entity will be informed of the situation.
- B. The monitor will review training site records. The monitor will request access to records relative to:

1. WIA activities at the training site and review them in the presence of training site personnel. The monitor will follow protocol established at V.,B.,1. for examining records in the monitored entity's office.
2. These records may or may not be the complete file,
 - a. and the monitor should refer to Section IV.,B.,4., for location of official office files.
3. When interviewing youth, the monitored entity will have
 - a. A representative present, if desired, during the interview.
 - b. The monitored entity representative should not be someone involved with participant selection or the selection of the work/training site.
 - c. During the interview, if the monitor and/or the monitored entity staff believe a problem is indicated, either the monitor or the monitored entity will then conduct a private interview.
4. For adult interviews, the monitored entity does not have to be
 - a. present during the interview, but the monitor will
 - b. discuss any problems/questions with the monitored entity
 - c. staff immediately, on the spot, if the monitored entity staff is available.
5. The monitor will observe the training environment.
6. In addition to verbal interviews at the training site, the monitor will attempt to observe broad aspects of the training environment that may not surface in interviews. Examples of such observations will include, but not be limited to,
 - a. condition and appropriateness of training
 - b. equipment,
 - c. environmental safety, etc.
7. Except for the introduction protocol (first), the sequence of monitoring activities at training sites will vary due to convenience of training site staff, participant training schedule, and other local considerations.

XII. CONDUCT PRE-EXIT PREPARATIONS: The Monitor will prepare all materials for presentation during the Exit Conference as follows:

- A. Assemble all collected data
- B. Evaluate data for findings or concerns
- C. Determine the content and validity of data
- D. Establish the number of occurrences of each concern or finding detected
- E. Establish the type of findings or concerns by researching citations from the law/regulations regarding each concern or finding
- F. Evaluate each concern or situation to determine if a finding or concern exists
- G. Compare findings or concerns to previous monitoring and audit reports to determine the frequency of occurrence in the past
- H. Note concerns that should be addressed with the monitored entity Director or other appropriate person

- I. Prepare all notes and supporting documentation in such a manner so that the exit conference can be accomplished in a professional and efficient manner
- J. Provide the monitored entity Director with a list of any requested information that has not been received
- K. Schedule the exit conference to be held with the monitored entity director within two (2) weeks of the completion of field monitoring
- L. Remind the monitored entity of the FOI Requirements

XIII. CONDUCT THE EXIT CONFERENCE: The Monitor will conduct the Exit Conference as follows:

- A. Remind the monitored entity of the FOI requirements as described at IV., C., 1. It is the responsibility of the monitored entity to ensure that all requirements of the FOI are met.
- B. Describe all items considered to be problems/potential findings and areas of concern without declaring which items will be declared as such in the final report.
- C. Request the monitored entity to describe on-the-spot corrections.
- D. Request the monitored entity to describe all corrective actions provided for problems identified by the monitor during the monitoring period (while on-site).
- E. Corrective action taken by the monitored entity before the report is officially written does not ensure that the finding will not be included in the report. However, if the finding is included, the report will note that corrective action was taken and if such corrective action is acceptable to remedy the situation.
- F. The parties will discuss clarification of any problems.
- G. The monitored entity will be given an opportunity to clarify, if necessary, any issues brought up by the monitor.
- H. The monitored entity will be given an opportunity to request clarification and information from the monitor.
- I. The monitor will accept any documents offered by the monitored entity that are relevant to the reported problems.
- J. The monitor will describe the required dates for submission of the report and responses.

XIV. ISSUE THE REPORT

- A. A written monitoring report will be issued to the monitored entity and will contain the following items:

1. Findings for which clarification are requested and for which clarification was not provided or was not sufficient during the monitoring and/or exit conference; and
 2. Findings for which corrective action are requested.
- B. Concerns, which may require clarification or corrective action, may be offered as information, if the concerns are considered as indications perceived to indicate potential problems and/or indicate need for further investigation and attention by the monitored entity. These concerns may be included in separate communication.
- C. All findings will be accompanied with a specific reference to that part of the Act, regulations, or other requirements which the monitor believes have been violated.
- D. Only findings, which describe conditions or activities which monitors witnessed personally, will be reported.
- E. Findings based on second-hand accusations, or other hearsay or what was heard will be included in the report only if verified by the monitor(s) or first-hand acknowledgment or statements by staff, supervisors, employers, participants, etc.
- F. Concerns will be reported, regardless of the source of information, when they relate to conditions or activities, which seem to have potential for significant negative **impact on the program**.
- G. The report will be mailed to the monitored entity within approximately thirty (30) calendar days following the date of the exit conference.
- H. The monitored entity will have seven calendar days from the date of the report to review the report for accuracy. This seven-day period will serve as a review stage to be sure the State staff or the monitored entity staff has not overlooked information that has a significant impact on any of the items noted in the report.
- I. If the State staff is not made aware of any information that has a significant impact on the items noted in the report within the seven-day period, the report will be considered a final report and a response will be due from the monitored entity within thirty (30) days of the report.

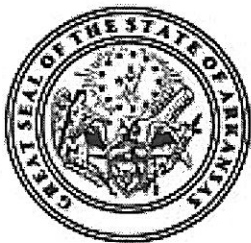
XV. PROCESS RESPONSES AND IMPLEMENT CORRECTIVE ACTION

- A. The monitored entity will receive and review the monitoring report. The monitored entity will respond to the report within thirty (30) calendar days of the date of the report or as otherwise scheduled in the letter of transmittal. The response:
1. Will provide requested clarification;
 2. Will describe the corrective action taken or being taken for each finding; and

3. Will provide documentation to support what the corrective action was (e.g., if a new procedure was needed, a copy of the written procedure; if a participant was determined ineligible, a copy of documentation showing that he/she is eligible or a copy of paperwork showing that the participant has been terminated immediately).
- B. The monitoring agency will respond to the monitored entity within fifteen (15) calendar days of the response's postmark accepting the corrective action taken and closing the report or requesting additional information or documentation.
1. If the monitoring agency is closing the report, process XVI. will be used.
 2. If additional information or documentation is requested, the process will be repeated, except that only fifteen (15) calendar days will be available for response.
 3. The monitoring agency will close the report, per process XVI.

XVI. CLOSE THE REPORT

- A. If no findings are reported, the monitoring report will be closed out and the monitoring agency will send a closeout letter to the monitored entity with the report.
- B. If there are findings, a letter closing the report will be issued within ten (10) calendar days of the receipt of the last response. If corrective action is determined acceptable, the closeout letter will constitute final action on the report.
- C. If, after two (2) responses from the monitored entity, corrective action is determined to be inadequate and findings are unresolved, a final determination will be written which will include identification of the unresolved issues and identify what steps are to be taken as a result of the unresolved issues. Within thirty (30) calendar days, copies of the letter and all related written reports and communications will be sent to the monitored entity, Local Workforce Investment Board Chair, AWIB, the monitoring agency's resolution staff, and the Department of Labor, if applicable.
- D. If sanctions are imposed, the monitored entity has the option of appealing through the WIA grievance process. Ten (10) calendar days after the final action on the grievance or the notification of imposed sanctions, copies of the report, responses and other related written communication will be mailed to the LWIB or Board Chairperson.



Jobs for People. People for Jobs.

DWS

Department of
WORKFORCE Services

ARKANSAS

**WORKFORCE INVESTMENT ACT (WIA) Title I-B
and Other Agency-Funded Grants**

PROGRAM AND FINANCIAL MONITORING INSTRUMENT

**DEPARTMENT OF WORKFORCE SERVICES (DWS)
OFFICE OF MONITORING AND COMPLIANCE (OMAC)**

Street Address: 1501 Main Street
Little Rock, Arkansas 72202

Telephone:

Fax:

Mailing Address: P. O. Box 2981
Little Rock, Arkansas 72203

(501) 682-3425

(501) 682-3137

(Revised March 2006)

ARKANSAS PROGRAM AND FINANCIAL

Workforce Investment Act (WIA) Title I-B and Other Agency-Funded Grants

MONITORING INSTRUMENT

TABLE OF CONTENTS

Table Of Content.....	Page i
Entrance Interview Notes.....	Page iv
Monitoring Visit Introduction Sheet	Page v
Local Area Documents Needed for Review	Page vi
Entrance Interview Sign-In Sheet.....	Page viii

SECTION A – PROGRAM REVIEW

PART I.	Policies and Procedures.....	Page 1-A
PART II.	Governance.....	Page 7-A
PART III.	One-Stop Certification and Operations.....	Page 10-A
PART IV.	Delivery of Adult and Dislocated Worker Services.....	Page 11-A
A.	Core Services.....	Page 11-A
B.	Intensive Services.....	Page 12-A
C.	Training Services.....	Page 13-A
D.	Individual Training Accounts (ITAs).....	Page 13-A
E.	Eligible Training Providers.....	Page 14-A
F.	Priority And Special Populations.....	Page 15-A
G.	On-The-Job Training (OJT) And Customized Training.....	Page 15-A

H.	Supportive Services.....	Page 16-A
PART V.	Delivery of Youth Services.....	Page 19-A
A.	Out-Of-School Youth.....	Page 20-A
B.	Youth Program Design, Elements, and Parameters.....	Page 20-A
C.	Concurrent Enrollment.....	Page 21-A
D.	Summer Youth Employment.....	Page 21-A
PART VI.	Oversight and Monitoring.....	Page 23-A
	Adult and Dislocated Worker Client File Check List.....	Page 25-A
	Youth Client File Check List.....	Page 26-A
	Client/Participant Interview Form.....	Page 27-A
	Supervisor Interview/Work/Training Site Review Form.....	Page 28-A

SECTION B –FINANCIAL REVIEW

PART I.	Procurement Review Guidelines.....	Page 1-B
	Small Purchase Worksheet - Procurement Tool 1.....	Page 3-B
	Capital Expenditure Worksheet - Procurement Tool 1A.....	Page 4-B
	Non-Competitive Proposal/Sole Source - Procurement Tool 2.....	Page 6-B
	Sealed Bid/Invitation For Bid (IFB) - Procurement Tool 3.....	Page 7-B
	Competitive Proposal/Request for Proposal (RFP) Procurement Tool – 4.....	Page 9-B
	Contract Review Worksheet (Governmental) - Procurement Tool 5A.....	Page 11-B
	Contract Review Worksheet (Non-governmental) - Procurement Tool 5B.....	Page 13-B
	Property Management - Procurement Tool 6.....	Page 15-B

PART II. WIA Financial Monitoring Instrument.....	Page 16-B
Accounting Systems/Controls.....	Page 17-B
Financial Reports.....	Page 18-B
Cash Receipts.....	Page 20-B
Cash Disbursements.....	Page 21-B
Petty Cash.....	Page 23-B
Cash Management/Excess Cash.....	Page 24-B
Bank Reconciliations.....	Page 26-B
Payroll System.....	Page 26-B
Bonding/Insurance.....	Page 28-B
Property Management/Leases.....	Page 29-B
Program Income.....	Page 29-B
Memorandum of Understanding.....	Page 31-B
Cost Allocation.....	Page 32-B
Cost Limitations.....	Page 33-B
Audit.....	Page 34-B
Procurement.....	Page 36-B
Incident Reporting.....	Page 36-B
Exit Interview Sign-In Sheet.....	Page 37-B
Exit Interview Notes.....	Page 38-B

MONITORING ENTRANCE INTERVIEW NOTES:

LWIA NAME: _____

DATE OF REVIEW: _____

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

MONITORING VISIT INTRODUCTION

Local Workforce Investment Area (LWIA) Being Monitored: *(Name/Address/Director of Area)*

Monitor/Monitoring) Team:

Local Workforce Investment Area Staff: *(Obtain and Attach A Recent Organizational Chart)*

Monitoring/Review Dates:

From: _____ **To:** _____

Entrance Interview General Notes: *(Complete the Attached Entrance Interview Sign-In Sheet)*

LOCAL AREA DOCUMENTS NEEDED FOR REVIEW

(The monitored entity may be requested to provide some documents prior to the date of the review. However, some documents may be reviewed on site.)

SECTION A – Program Review Documents:

1. Local 2-Year Plan
2. Changes to the Local Plan (***ALL Changes Must be approved by the Local and State WIB***)
3. Local Area Written Policies and Procedures (*At a minimum, Local Area applicable Written Policies and Procedures must include the following*):
 - a. Supportive Services (*including eligibility*)
 - b. On-the-Job Training (OJT) (*including contract procedures*)
 - c. Customized Training (*including contract procedures*)
 - d. Work Experience (*including contract procedures*)
 - e. Individual Training Account (ITA) (*and procedures for use*)
 - f. Grievance Procedures of Local Board (*or Administrative Entity/Grant Recipient*)
 - g. Grievance Procedures of One-Stop Operator
 - h. All other policies approved by the Local Board
 - i. Program and Service Procedures used in the One-Stop and WIA Title I-B
 - j. All forms and checklists used by front-line staff and internal monitors
 - k. Monitoring procedures (*internal and external, if applicable*)
 - l. Procedures for Resolution of Findings arising from -
 - 1) Audits
 - 2) Investigations
 - 3) Monitoring and Oversight
4. Internal program Monitoring Reports (*as completed by the Local Board and/or Local Area Monitoring staff*)
5. Organizational Chart (*which includes names of Local Board staff and/or Administrative/Grant Recipient and the One-Stop Operator staff [WIA Organization only for operator staff], including Staff Job Descriptions*)
6. List of current worksites for the following programs -
 - a. Youth
 - b. OJT
 - c. Work Experience
 - d. Other

7. Worksite Agreements (*for the above listed worksites*)
8. Information concerning OJT and Customized Training contracts:
 - a. Workforce at each training site
 - b. Contract amounts and amounts expended by funding stream
 - c. Number served to date
 - d. Number currently being served
9. Local Workforce Investment Board Members (*including the following*):
 - a. Membership grid (listing categories represented) as last certified by AWIB
 - b. Changes since last Certification
 - c. Youth Council Membership with categories of representation
10. Current contact list, i.e., case managers, office locations, addresses, telephone numbers at each location

SECTION B – Financial Review Documents:

- A. Chart of Accounts
- B. Financial Procedures/Policies
- C. Monthly Financial Requests (MFRs)
- D. Invoices
- E. Travel Policies, Travel Reports and Supporting Documentation
- F. Current Inventory of All Property
- G. Petty Cash
- H. Excess Cash
- I. Bank Reconciliations
- J. Leave Policy
- K. Payroll
- L. Bank Collateralization
- M. Leases
- N. Schedule of Available Funds
- O. Audit Procurement File Review
- P. LWIA Policies/Lists
- Q. Management Letter
- R. Blank Request For Proposal (RFP)
- S. Contracts
- T. Internal and Contract Monitoring Reports
- U. Employee Handbook
- V. Insurance and Bonding
- W. Accounts Payable Register and General Ledger
- X. Other Financial Reports
- Y. List of Board Members and Disclosure Statements
- Z. Administration Allocation

MONITORING ENTRANCE INTERVIEW SIGN-IN SHEET

(ATTACH ADDITIONAL SHEETS IF NECESSARY)

For The _____

(ATTACH ADDITIONAL SHEETS IF NECESSARY)

Arkansas Local Workforce Investment Area

Date: _____

<u>NAME</u>	<u>ORGANIZATION</u>	<u>JOB TITLE OR PROFESSION</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

PART I.

POLICIES AND PROCEDURES

(Request a copy of any LWIA locally written Policies and/or Procedures, which will be used during the review process. Include any written comments for each review item as necessary.)

1. Does your local area provide at the minimum, core, intensive and training services at the one-stop level? ☐ Yes ☐ No. Are any of the other services listed in **WIA Section 134(e)** provided in your local area? ☐ Yes ☐ No **[Reference: 20 CFR 663.145]**

Comments: _____

2. Does your local area document, in Arkansas JobLink (AJL) and hardcopy, intensive services for adults and dislocated workers? ☐ Yes ☐ No **[Reference: 20 CFR 663.210]**

Comments: _____

3. Does your local area document, in AJL and hardcopy, training services for adults and dislocated workers? ☐ Yes ☐ No **[Reference: 20 CFR 663.310]**

Comments: _____

4. Does your local area have a policy and/or procedure for out-of-area assistance and relocation assistance? ☐ Yes ☐ No. **[Reference: 20 CFR 663.200(a)]**

Comments: _____

5. Does your local area give priority to low-income individuals in the event of limited funding? ☐ Yes ☐ No. **[(Reference: 20 CFR 663.600(b))]**

Comments: _____

6. Does your local area have a policy for limiting the dollar amount and duration of Individual Training Accounts (ITAs)? ☐ Yes ☐ No. **[Reference: 20 CFR 663.420(a)(c)]**

Comments: _____

7. Does your local area utilize mechanisms other than ITAs to provide training services (i.e. OJT and/or customized training)? ☐ Yes ☐ No. **[Reference: 20 CFR 663.430]**

Comments: _____

8. Does your local area have a policy for determining the time limitation of an OJT contract?
__Yes __No __N/A. **[Reference: 20 CFR 663.700(c)]**

Comments: _____

9. Does your local area have a policy for determining "self- sufficiency/sufficient wage" as it pertains to OJT and customized training? __Yes __No. **[Reference: 20 CFR 663.230, 663.705(a) and 663.720(a)]**

Comments: _____

10. Does your local area have a policy for the provision of supportive services to adults and dislocated workers? __Yes __No. **[Reference: 20 CFR 663.800]**

Comments: _____

11. Does your local area have a policy for determining the level of needs-related payments for adults and dislocated workers? __Yes __No. **[Reference: 20 CFR 663.840]**

Comments: _____

12. Does your local area have a policy for providing/documenting follow-up services? __Yes __No. **[Reference: WIA, Section 134 (d)(2)(k)]**

Comments: _____

13. Does your local area have a policy regarding the monitoring of subrecipients and contractors, including follow-up and resolution processes? __Yes __No. **[Reference: 20 CFR 667.410(a)(1-3)]**

Comments: _____

14. Does your local area have a policy regarding the provision of technical assistance to subrecipients and contractors? __Yes __No. **[Reference: 20 CFR 667.410(a)(3)]**

Comments: _____

15. Does your local area have a policy regarding oversight responsibilities of the youth council? __Yes __No. **[Reference: 20 CFR 661.340, 664.110]**

Comments: _____

16. Does your LWIA plan utilize the five percent (5%) window for youth? ☐ Yes ☐ No. Plan section/page number: _____. **[Reference: 20 CFR 664.220]**

Comments: _____

17. Does your LWIA have a policy regarding additional barrier(s), as it pertains to the youth that qualify under the five percent (5%) window? ☐ Yes ☐ No. **[Reference: 20 CFR 664.220(h)]**

Comments: _____

18. Does your LWIA track the required thirty percent (30%) expenditures for out-of-school youth? ☐ Yes ☐ No. **[Reference: 20 CFR 664.320]**

Comments: _____

19. Does your LWIA ensure that the following concentrations are included in the design of local youth programs: Objective assessment; Academic and occupational skill levels; Individual Service Strategy; Establishment of career goals; Preparation for post-secondary education opportunities; Linkages between academic and occupational learning; Preparation for employment; Links to the job market and employers? ☐ Yes ☐ No. **[Reference: 20 CFR 664.405(a)(1-3)]**

Comments: _____

20. Does your local LWIA provide linkages to entities that will foster the participation of eligible local area youth (i.e. law enforcement, housing authority, Job Corps, local education agencies)? ☐ Yes ☐ No. **[Reference: 20 CFR 664.405 (c)]**

Comments: _____

21. Does your local LWIA ensure that income eligibility for youth is met? ☐ Yes ☐ No. **[Reference: WIA, Section 101 (25); and 20 CFR 664.200]**

Comments: _____

22. Does your local LWIA have a policy for referral of youth to other agencies for service? ☐ Yes ☐ No. **[Reference: 20 CFR 664.405 (d)(2)]**

Comments: _____

23. Does the LWIA ensure that parents, youth participants and individuals in the youth-community play a role in the design and implementation of youth programs? ☐ Yes ☐ No. **[Reference: 20 CFR 664.405 (f)]**

Comments: _____

24. Does your local LWIA have a policy for determining "recent" as it pertains to objective assessment and individual service strategies? ☐ Yes ☐ No. **[Reference: 20 CFR 664.405 (g)]**

Comments: _____

25. Does your local LWIA ensure that the ten program elements, as defined in **664.410 (a)**, are options that are available to youth? ☐ Yes ☐ No. **[Reference: 20 CFR 664.410 (a)]**

Comments: _____

26. Does your local LWIA provide supportive services for youth? ☐ Yes ☐ No. **[Reference: 20 CFR 664.440]**

Comments: _____

27. Does your local LWIA provide follow-up services for youth? ☐ Yes ☐ No. **[Reference: 20 CFR 664.450 (a)]**

Comments: _____

28. Does your local LWIA track the required twelve (12) month follow-up for youth? ☐ Yes ☐ No. **[Reference: 20 CFR 664.450 (b)]**

Comments: _____

29. Does your local LWIA identify and track how funding and services are provided for concurrently enrolled youth/adults (18-21)? ☐ Yes ☐ No. **[Reference: 20 CFR 664.500 (c)]**

Comments: _____

30. Does your local LWIA have a policy to determine "appropriate levels of youth, adult and dislocated worker services" for the concurrently enrolled? ☐ Yes ☐ No. **[Reference: 20 CFR 664.500 (b)]**

Comments: _____

31. Does your local LWIA have a policy for providing summer employment opportunities? ☐ Yes ☐ No. **[Reference: 20 CFR 664.600]**

Comments: _____

32. Does your local LWIA have a policy on how the LWIA administers the summer employment element? ☐ Yes ☐ No. **[Reference: 20 CFR 664.610]**

Comments: _____

33. Does your local LWIA have a policy/system that tracks performance measures? ☐ Yes ☐ No. (Please obtain a copy.) **[Reference: 20 CFR 666.300 and 666.310]**

A. Is the LWIA meeting the Area performance requirements? ☐ Yes ☐ No. If no, please list the measures that are not being met. _____

B. Do you have a corrective action plan for assuring they will be met? ☐ Yes ☐ No

Comments: _____

34. Does your LWIA have a grievance process, including resolution, on the local level? ☐ Yes ☐ No. (Please obtain a copy.) **[Reference: 20 CFR 667.600 (b)]**

Comments: _____

35. Does your local LWIA have a policy for selecting local youth service providers? ☐ Yes ☐ No. **[Reference: WIA, Section 117(d)(2)(B)]**

Comments: _____

36. Are there any participants who have been enrolled in any WIA Title 1-B program for 90 days or more, who have not received services? ☐ Yes ☐ No. **If yes, please obtain, on separate document, proof of the services that will be provided, or the date the participant(s) will be exited. [Reference: TEGL 17-05]**

Comments: _____

37. Arkansas JobLink (AJL) is the State's official reporting system. Are all data fields being completed and entered in a timely and accurate manner? ☐ Yes ☐ No. Does the LWIA utilize the *Enrollment notes* section? ☐ Yes ☐ No. The *Individual Employment Plan* section? ☐ Yes ☐ No. **[Reference: 20 CFR 667.300 and AWIB ISSUANCE PY 03-27]**

Comments: _____

38. Does the Local Area have a policy/system for Data Validation? ☐ Yes ☐ No. If yes, obtain a copy. If no, please provide explanation. **[Reference: 20 CFR 666.100 and Issuance PY 01-17]**

Comments: _____

39. Does the Local Area provide Case Management at the One-Stop level? ☐ Yes ☐ No. If yes, obtain a copy of policy or procedures. If no, please provide explanation.
[Reference: 20 CFR 661.310]

Comments: _____

Additional Comments For PART I (Use additional sheets if necessary.): _____

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

PART II. **GOVERNANCE** *(Local Workforce Investment Board [LWIB])*

1. Are all LWIB vacancies filled? ☐ Yes ☐ No. Is the Board certification current? ☐ Yes ☐ No. If no, please provide explanation. **[Reference: 20 CFR 661.325]**

Comments: _____

2. Do representatives of (private industry) business constitute fifty-one (51%) of the LWIB? ☐ Yes ☐ No. If no, please provide explanation. **[Reference: 20 CFR 661.315 (d)]**

Comments: _____

3. Do you provide new LWIB members with an orientation of the role of the local board? ☐ Yes ☐ No. **[Reference: 20 CFR 661.305]**

Comments: _____

4. Does the LWIB have an approved two-year local plan? ☐ Yes ☐ No. **[Reference: 20 CFR 661.350 (b)]**

Comments: _____

5. Has the local plan been amended during the current year? ☐ Yes ☐ No. If yes, please provide details of any amendments. **[Reference: 20 CFR 661.355]**

Comments: _____

6. Is there a policy/procedure in place for the selection of the One-Stop Operator(s)? ☐ Yes ☐ No. **[Reference: 20 CFR 662.410(a)(b)]**

Comments: _____

7. Is there a procedure in place used by the LWIB to review and/or initiate new policies? ☐ Yes ☐ No. **[Reference: 20 CFR 661.300 (b)]**

Comments: _____

8. Does the LWIB, or its members, take(s) an active role as part of its oversight responsibility (review, evaluation and monitoring) of the local One-Stop system? ☐ Yes ☐ No. **[Reference: 20 CFR 661.305(a)(1)]**

Comments: _____

9. Has the LWIB established local performance measures? ☐ Yes ☐ No. (If yes, please obtain a copy.) **[Reference: 20 CFR 661.305(a)(5)]**

Comments: _____

10. Does the LWIB coordinate with local economic development and local employers? ☐ Yes ☐ No. If no, please provide explanation. **[Reference: 20 CFR 661.305(a)(7)]**

Comments: _____

11. Does the LWIB promote private sector involvement in the local workforce investment system? ☐ Yes ☐ No. If no, please provide explanation. **[Reference: 20 CFR 661.305(a)(8)]**

Comments: _____

12. Does the LWIB have an established youth council? ☐ Yes ☐ No. If no, please provide explanation. **[Reference: 20 CFR 661.305 (b)]**

Comments: _____

13. Does the youth council membership include all of the required partners? ☐ Members of the local board? ☐ Members of service agencies (i.e. juvenile justice, local law enforcement)? ☐ Members of public housing? ☐ Parents? ☐ Job Corps? ☐ Other interested parties (former participants, other youth agencies)? Or ☐ Others as deemed necessary by the LWIB? If no, please provide explanation. **[Reference: 20 CFR 661.335]**

Comments: _____

14. Does the youth council provide linkages with local education agencies? ☐ Yes ☐ No. If no, please provide explanation. **[Reference: 20 CFR 661.340 (e)]**

Comments: _____

15. Is a policy/procedure in place for the selection of youth providers? ☐ Yes ☐ No. **[Reference: 20 CFR 661.340 (c)]**

Comments: _____

16. Does the LWIB directly provide core, intensive or training services? ☐ Yes ☐ No. If yes, what services are provided? **[Reference: 20 CFR 661.310]**

Comments: _____

(NOTE: If the answer to #16 is only core and intensive services, answer question A. If the answer to #16 includes training services, answer questions A and B.)

- A. Does the LWIB have written concurrence from the chief elected official and the State to provide these services? ☐ Yes ☐ No. If yes, obtain a copy. If no, please provide an explanation. **[Reference: 20 CFR 661.310(a)]**

Comments: _____

- B. Does the LWIB have a waiver to provide training services? ☐ Yes ☐ No. If yes, request a copy). **[Reference: 20 CFR 661.310(b)]**

Comments: _____

17. Is the LWIB certified as the local One-Stop Operator? ☐ Yes ☐ No. If yes, does the LWIB have written concurrence from the chief elected official(s) and the State? Request a copy. **[Reference: 20 CFR 661.310]**

Comments: _____

18. Is any staff of the LWIB involved in the provision of core, intensive, or training services, or designated or certified as One-Stop Operator? __Yes __No. **[Reference: 20 CFR 661.310(c)]**

Comments: _____

Additional Comments For PART II (*Use additional sheets if necessary.*): _____

[illegible]

PART III.

ONE-STOP CERTIFICATION AND OPERATIONS

1. Does the LWIA have at least one comprehensive physical One-Stop/Workforce Center to provide the core services specified in **WIA 134(d)(2)**? ☐ Yes ☐ No. **[Reference: 20 CFR 662.100(c)]**

Comments: _____

2. Does the Local Area have a Cost Allocation Plan? ☐ Yes ☐ No. If yes, obtain a copy. If no, please provide explanation. **[Reference: 20 CFR 662.270]**

Comments: _____

3. A Memorandum of Understanding (MOU) is required between the Local Board, with the agreement of the chief elected official, and the One-Stop partners relating to the operation of the One-Stop delivery system in the local area. Do you have a MOU signed by each of the above? ☐ Yes ☐ No. **[Reference: 20 CFR 662.300 (a)(b)]**

Comments: _____

4. What type of MOU was developed for the local area? ☐ Comprehensive Umbrella MOU, ☐ Single MOU, Or, ☐ A separate MOU between the Local Board and each partner? **[Reference: 20 CFR 662.310]**

Comments: _____

5. Since funds are generally appropriated annually, financial agreements may be negotiated with each partner annually to clarify funding of services and operating costs of the system under the MOU. What is the duration of your Local Areas MOU? _____. **[Reference: 20 CFR 662.310(a)]**

Comments: _____

6. Is a policy/procedure in place for the selection of the One-Stop Operator(s)? ☐ Yes ☐ No. **[Reference: 20 CFR 662.410(a)(b)]**

Comments: _____

Additional Comments For PART III (Use additional sheets if necessary.): _____

PART IV. DELIVERY OF ADULT AND DISLOCATED WORKER SERVICES THROUGH THE ONE-STOP SYSTEM

1. Are all adults who receive services beyond self service or informational activities registered in AJL? ☐ Yes ☐ No. If no, please provide an explanation. **[Reference: 20 CFR 663.105]**

Comments: _____

2. Do you use Employment Assistance (EA) Issuance PY 01-17 and other Issuances for documentation guidelines? ☐ Yes ☐ No. If no, please provide explanation. **[Reference: EA Issuance Number PY 01-17]**

Comments: _____

3. Has EA Issuance PY 01-17 been made available to all case managers and new hires? ☐ Yes ☐ No. If no, please provide an explanation. **[Reference: EA Issuance Number PY 01-17]**

Comments: _____

4. Are all individuals receiving at least one core service as outlined in the Federal Regulations at Section 663.160? ☐ Yes ☐ No. If no, please provide an explanation. **[Reference: 20 CFR 663.160]**

Comments: _____

5. Do you require an individual to be in a core service for a certain amount of time before receiving intensive services? ☐ Yes ☐ No. If yes, please provide explanation. **[Reference: 20 CFR 663.165]**

Comments: _____

A. CORE SERVICES

1. Do you maintain check sheets and eligibility criteria for core services in both the adult and dislocated programs? ☐ Yes ☐ No. If no, please provide explanation. **[Reference: 20 CFR 663.110 and 663.115]**

Comments: _____

2. Are core services provided through the One-Stop Delivery System? ☐ Yes ☐ No. Are core services provided by the One-Stop Operator? ☐ Yes ☐ No. Or, are they provided through a contract? ☐ Yes ☐ No. If core services are provided through a contract, who is the contract with? _____. **[Reference: 20 CFR 663.155]**

Comments: _____

3. Are all core services being provided to adults and dislocated workers as required? ☐ Yes ☐ No. If no, please provide an explanation. **[Reference: 20 CFR 663.150]**

Comments: _____

B. INTENSIVE SERVICES

1. Do you maintain check sheets and eligibility criteria for intensive services in both the adult and dislocated programs? ☐ Yes ☐ No. If no, please provide an explanation. **[Reference: 20 CFR 663.220]**

Comments: _____

2. Has the area set specific criteria, which is used to determine whether an employed worker needs intensive services to obtain or retain employment leading to "self-sufficiency"? ☐ Yes ☐ No. If yes, please provide a copy of the criteria. **[Reference: 20 CFR 663.220]**

Comments: _____

3. An Individual Employment Plan (IEP) is the minimum intensive service an individual must receive before receiving training services. Is an IEP developed before placing someone into training? ☐ Yes ☐ No. If no, what is the intensive service the individual usually receives? **[Reference: 20 CFR 663.240]**

Comments: _____

4. Do you require an individual to be in an intensive service for a certain amount of time before receiving training services? ☐ Yes ☐ No. If yes, please provide an explanation. **[Reference: 20 CFR 663.250]**

Comments: _____

5. Is all participant information, including enrollment notes and the IEP data, entered into the Arkansas JobLink reporting system? ☐ Yes ☐ No. If no, please provide an explanation. **[Reference: AWIB ISSUANCE PY 03-27]**

Comments: _____

C. TRAINING SERVICES

1. Before enrolling an individual into any training program, does your area document that the individual: (1) Has received at least one intensive service ☐ Yes ☐ No; (2) Has met the eligibility requirements ☐ Yes ☐ No; (3) Has been determined by the one-stop operator to be in need of training and has the skills and qualifications to successfully complete the training program ☐ Yes ☐ No; (4) Has selected a program that is directly linked to the employment opportunities in the local area or is willing to relocate ☐ Yes ☐ No; and (5) Is unable to obtain grant assistance from other sources? ☐ Yes ☐ No. If the answer to any of the above is no, please provide an explanation. **[Reference: 20 CFR 663.310]**

Comments: _____

2. Do you coordinate with the training provider for other grant sources such as Pell, to help pay for the cost of training? ☐ Yes ☐ No. If no, please provide an explanation. **[Reference: 20 CFR 663.320(b)]**

Comments: _____

3. Does your area have an MOU or other agreement with all training sites setting the guidelines for coordination and/or possible reimbursement of Pell Grant when awarded? ☐ Yes ☐ No. If no, please provide an explanation. **[Reference: 20 CFR 663.320(c)]**

Comments: _____

D. INDIVIDUAL TRAINING ACCOUNTS (ITAs)

1. Do you set limits on the amount of funding for ITAs? ☐ Yes ☐ No. If yes, what are the funding limits? _____. **[Reference: 20 CFR 663.420]**

Comments: _____

2. Do you set time limits on the amount of ITAs? ☐ Yes ☐ No. If yes, what are the time limits? _____. **[Reference: 20 CFR 663.420]**

Comments: _____

-
3. Is the ACRS system (State list) provided to each eligible individual, thus maximizing customer choice? ☐ Yes ☐ No. If no, please provide an explanation. **[Reference: 20 CFR 663.440]**

Comments: _____

4. Is complete ITA information, including location name, start and end dates, and ITA amounts entered into the AJL reporting system? ☐ Yes ☐ No. If no, please provide an explanation. **[Reference: Issuance Number PY 03-27]**

Comments: _____

E. ELIGIBLE TRAINING PROVIDERS

1. Who, in your Local Area, manages the Eligible Training Provider (ETP) list? **[Reference: 20 CFR 663.500]**

Comments: _____

2. Does the manager of the local ETP list accept applications, collect performance and cost information, and other required information, submit the local list, and ensure dissemination and appropriate use? ☐ Yes ☐ No. If no, please provide an explanation. **[Reference: 20 CFR 663.510]**

Comments: _____

3. Is the ETP list kept up-to-date with accurate information, i.e., performance, cost and other required information? ☐ Yes ☐ No. If no, please provide an explanation. **[Reference: 20 CFR 663.510(d)(4)]**

Comments: _____

4. Does the local training provider list contain providers who do not automatically qualify (Higher Education Act/HEA, National Apprenticeship Act/NAA) for "initial" eligibility status to the statewide training provider list? ☐ Yes ☐ No. **[Reference: 20 CFR 663.515(c)(1)]**

Comments: _____

5. Does your local area allow for the training of eligible individuals outside the local area? ☐ Yes ☐ No. If no, please provide an explanation. **[Reference: 20 CFR 663.585]**

Comments: _____

F. PRIORITY AND SPECIAL POPULATIONS

1. If funds are limited, priority for intensive and training services must be given to low-income adults and public assistance recipients served with funds under Title I. Does your area have a system to guarantee this priority? ☐ Yes ☐ No. If no, please provide an explanation. **[Reference: 20 CFR 663.600 and WIA, Section 134(d)(4)(E)]**

Comments: _____

2. The priority of adult funding “does not” apply to the dislocated worker funding stream. Does your area apply a priority system to the dislocated worker funds? ☐ Yes ☐ No. If yes, please provide an explanation. **[Reference: 20 CFR 663.610]**

Comments: _____

3. An individual with a disability, whose family does not meet income eligibility criteria under the Act, may be considered a low-income individual. Does your area have guidelines established to determine eligibility of an individual with a disability? ☐ Yes ☐ No. If no, please provide an explanation. **[Reference: 20 CFR 663.640]**

Comments: _____

G. ON-THE-JOB TRAINING (OJT) AND CUSTOMIZED TRAINING

1. Does your area contract with any public, private non-profit, or private sector employers for OJT or Customized Training? ☐ Yes ☐ No. **If no, please skip to next section.**

Comments: _____

2. Are employers followed up on to verify that OJT participants are provided long term employment with wages, benefits, and working conditions that are equal to those provided to regular employees? ☐ Yes ☐ No. If no, please explain. **[Reference: 20 CFR 663.700 (b)]**

Comments: _____

3. OJT contracts must be limited to the period of time required for a participant to become proficient in the occupation for which training is being provided. Are OJT contracts based on skill requirements for the occupation, the skill level of the participant, prior work

experience, and the participant's employment plan? ____Yes ____No. If no, please explain. **[Reference: 20 CFR 663.700(c)]**

Comments: _____

4. If an OJT contract is written for an employed worker, the employee must not be making a self-sufficient wage as determined by the local board. Does your local area verify self-sufficiency before entering into an OJT contract? ____Yes ____No. **[Reference: 20 CFR 663.705]**

Comments: _____

5. Does the OJT relate to the introduction of new technologies, new production or service procedures, upgrading to a new job that requires additional skills, workplace literacy, etc.? ____Yes ____No. **[Reference: 20 CFR 663.705]**

Comments: _____

6. For OJT contracts, what is the usual wage rate reimbursement percentage? _____
[Reference: 20 CFR 663.710(b)]

Comments: _____

7. For Customized Training, what is the usual employer paid wage rate percentage? _____
[Reference: 20 CFR 663.710(b) and 663.715(c)]

Comments: _____

H. SUPPORTIVE SERVICES

1. Does your area provide supportive services? ____Yes ____No. *If no, please skip to question (6).* **[Reference: 20 CFR 663.800]**

Comments: _____

2. Supportive services are only to be provided to eligible participants who are unable to obtain services through other programs. Does your local area coordinate with other programs that may be able to provide such services? ____Yes ____No. If no, please explain. **[Reference: 20 CFR 663.805]**

Comments: _____

3. Are supportive services provided only when necessary to enable an individual to participate in Title I activities? ☐ Yes ☐ No. If no, please explain. **[Reference: 20 CFR 663.805(b) and WIA, Section 101(46)]**

Comments: _____

4. Does your local area set limits on supportive services? ☐ Yes ☐ No. If yes, what are the limits? **[Reference: 20 CFR 663.810(a)]**

Comments: _____

5. Does your local area grant exceptions to the limits set in item number 4 above? ☐ Yes ☐ No. **[Reference: 20 CFR 663.810(b)]**

Comments: _____

6. Are the exceptions established and included in written procedures? ☐ Yes ☐ No. If no, please explain.

Comments: _____

7. Are needs-related payments provided in your local area? ☐ Yes ☐ No. **If no, please skip to end of this section. [Reference: 20 CFR 663.815]**

Comments: _____

8. In order to receive needs-related payments, are Adult/DLW participants screened to verify they are unemployed, have ceased to qualify for unemployment or trade readjustment allowance, and have been enrolled in program of training services under WIA Section 134(d)(4); Or be unemployed and did not qualify for UI or TAA readjustment assistance? ☐ Yes ☐ No. If no, please explain. **[Reference: 20 CFR 663.825]**

Comments: _____

9. Does your local area allow needs-related payments to begin 30 calendar days before training begins for participants accepted in a training program? ☐ Yes ☐ No. If no, please explain. **[Reference: 20 CFR 663.830]**

Comments: _____

10. Has a needs-related payment level been established by the local area? ☐ Yes ☐ No? If no, please explain. **[Reference: 20 CFR 663.840(a)]**

Comments: _____

This image shows a full page of blank, lined paper. It features approximately 28 horizontal blue or grey lines spaced evenly apart, typical of notebook paper. The lines extend across the entire width of the page, leaving small margins at the top and bottom. There are no vertical lines, text, or other markings on the page.

PART V. DELIVERY OF YOUTH SERVICES

1. A youth, age 14-21 must be a low-income individual to be eligible for services. Do you collect and document family income? ___Yes ___No. If no, please explain.

[Reference: 20 CFR 664.200]

Comments: _____

2. A youth, age 14-21 must also have a barrier. Do you collect and document the barrier for eligibility determination? ___Yes ___No. **[Reference: 20 CFR 664.200]**

Comments: _____

3. Has your local area defined the sixth youth criterion: (An individual who requires additional assistance to complete an educational program, or to secure and hold employment)? ___Yes ___No. If yes, please obtain a copy. **[Reference: 20 CFR 664.210]**

Comments: _____

4. Are all youth participants registered in the State MIS system? ___Yes ___No. **[Reference: 20 CFR 664.215]**

Comments: _____

5. Does your local area permit youth who are not low-income individuals to receive youth services? ___Yes ___No. If yes, how do you track the 5% served? **[Reference: 20 CFR 664.220]**

Comments: _____

6. How many total youth participants are the Local Area currently serving? **[Reference: 20 CFR 664.220]**

How many youth are within the 5% window? _____

Are any youth over the 5% window? ___Yes ___No. If yes, how many? _____

Comments: _____

7. Has your local area defined the criterion for the barrier category: (face serious barriers to employment)? If yes, please obtain a copy. If no, please explain. **[Reference: 20 CFR 664.220(h) and WIA Section129(c)(5)]**

Comments: _____

-
8. Does the Local Area have a system or written procedures that describes Youth enrollments, services, and recorded outcomes. If yes, please obtain a copy. If no, please explain.

Comments: _____

A. OUT-OF-SCHOOL YOUTH

1. Does your local area coordinate with "alternative schools" or other educational programs, so that youth can be registered as an out-of-school youth? ____Yes ____No. If no, please explain. **[Reference: 20 CFR 664.310, 664.320]**

Comments: _____

2. Thirty percent (30%) of youth funds are to be used for out-of-school youth. How do you document the funds spent on out-of-school youth? **[Reference: 20 CFR 664.320, WIA 128(b)(2)(A)]**

Comments: _____

B. YOUTH PROGRAM DESIGN, ELEMENTS, AND PARAMETERS

1. The program provider must provide an objective assessment that includes a review of academic and occupational skill levels and service needs. (Note: The provider may use a recent objective assessment that was developed under another educational or training program). Do you complete an objective assessment on all youth participants? ____Yes ____No. **[Reference: 20 CFR 664.405(a)(1)]**

Comments: _____

2. The development of an individual service strategy (ISS) must be completed which identifies a career goal and a consideration of the assessment results. (Note: The provider may use a recent individual service strategy that was developed under another educational or training program). Do you complete an ISS on each youth participant? ____Yes ____No. Do you maintain the ISS as a living document? ____Yes ____No. **[Reference: 20 CFR 664.405(a)(2)]**

Comments: _____

3. Does your local Youth Program Design provide preparation for postsecondary educational opportunities, linkages between occupational and academic learning, preparation for employment and effective connections to intermediary organizations that provide strong links to the job market and employers? ____ Yes ____ No. **[Reference: 20 CFR 664.405(a)(3)]**

Comments: _____

4. Local Youth Programs must include each of the ten (10) program elements listed in WIA section 129 (c)(2) as options available to youth participants. Does your local youth program provide all ten elements? ____ Yes ____ No. If no, please explain. **[Reference: 20 CFR 664.410]**

Comments: _____

5. Are there any youth participants who have been in the program for 90 days or more who have not received services? ____ Yes ____ No. If yes, please explain. **[Reference: TEGL 17-05 and Issuance PY 03-27]**

Comments: _____

C. CONCURRENT ENROLLMENT

1. Eligible individuals who are 18-21 may participate in adult and youth programs concurrently. These individuals must be eligible under the youth or adult eligibility criteria applicable to the services received. Only those individuals 18-21 who qualify as an adult may use the Individual Training Account system. Does your program include concurrent enrollments? ____ Yes ____ No. **[Reference: 20 CFR 664.500]**

Comments: _____

2. A waiver was approved in March 2003 by the Arkansas Workforce Investment Board (AWIB) to allow Older Youth ITAs. Do you have any participants on an Older Youth ITA? ____ Yes ____ No. **[Reference: AWIB Waiver]**

Comments: _____

D. SUMMER YOUTH EMPLOYMENT

1. Local boards are required to offer summer youth employment opportunities that link academic and occupational learning. Summer youth is not designed to be a stand-alone program. Is your summer youth program linked with an academic and occupational

Comments: _____

- Comments:** _____

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

PART VI. **OVERSIGHT AND MONITORING**

1. Each recipient and subrecipient must continuously monitor grant supported activities in accordance with the uniform administrative requirements at 29 CFR parts 95 and 97, as applicable, including the applicable cost principles indicated at 29 CFR 97.22(b) or 29 CFR 95.27 for non-profit organizations the applicable requirements are at 29 CFR part 95. Describe how you continuously monitor. **[Reference: 20 CFR 667.400 (c)(1) and 667.410]**

Comments: _____

2. From your most recent monitoring was there a specific area or program monitored?
___Yes ___No. Obtain a copy of the report.

Comments: _____

3. During the last monitoring process completed by your Local Area monitor, were there any findings? ___Yes ___No. When was the monitoring completed? _____
Were there any findings, which are not yet resolved? ___Yes ___No. **[Reference: 20 CFR 667.410]**

Comments: _____

4. From the last local monitoring, was technical assistance provided and/or requested?
___Yes ___No. If yes what/who provided the TA? **[Reference: 20 CFR 667.410]**

Comments: _____

5. Who is responsible for the resolution of findings from monitoring and oversight reviews at each of the following levels? **[Reference: 20 CFR 667.500]**

LWIB: _____
One-Stop Operator: _____
Service Provider: _____

Comments: _____

6. Are there written procedures for resolving findings arising from audits, investigations, monitoring and oversight reviews? ___Yes ___No. Please obtain a copy. **[Reference: 20 CFR 667.500]**

Comments: _____

- Comments:** _____

- Comments:** _____

- Comments:** _____

- Comments:** _____

- Comments:** _____

This image shows a single sheet of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

IAME		LWIA:	Monitor(s):
NUMBER	Personnel Policies, Rights & Benefits	Hatch Act/Grievance/EEO	Proof of Age / Identity
	Citizenship / Work Authorization	Selective Service Registered (Jan. 1, 1960 or after - Males)	Eligibility / Certification Sheet
	Economic/Local Priority Eligibility	DLW / DH Eligible	Individual Employment Plan & Current
	Labor Force Status at Intake	Rec. At Least One Core Service	Unable to Obtain Employment thru Core Services
	Met Eligibility For Intensive Services	Received At Least One Intensive Service	Unable to Obtain Employment thru Intensive Services
	In Need of Training Services	Skills/Qualifications To Comp. Training	Verified Training Program In Demand
	Grant/Assistance Coordinated	ITA Voucher	I-9 (For Employment Activities)
	Job Description (OJT or WE)	Last Service Date > 90 Days	Credentials Verification
	Case Mgt. Notes current and in MIS	All Activities documented in MIS	

LWIA:

[illegible]

CLIENT/PARTICIPANT INTERVIEW FORM

Participant Name: _____ Age: _____ Date: _____

Work/Training Location: _____ Address: _____

Participant Status: ☐ YOUTH ☐ ADULT ☐ DLW

1. How many hours per week do you spend in the classroom? _____

2. What has your instructor been teaching you? _____

3. Have you ever had this type of training before? _____

4. Do you feel you are benefiting from the program? _____ If no, please explain: _____

5. Do you sign an attendance sheet each time you meet with the instructor or report to work? _____

7. Where are you working and who is your supervisor? _____

8. How many hours per week do you work? _____ How much per hour do you make? _____

9. Do you have supervision at all times? _____ If no, please explain: _____

10. Were you advised of the pay schedule before you started to work? _____

11. What kind of work have you been doing? _____

12. Do you have enough work to keep you busy? _____

13. Do you feel the working conditions are safe? _____ If no, please explain: _____

14. Have you ever had an accident while at work on this program? _____ If yes, did you report it to your supervisor? _____ Please explain the accident: _____

15. Do you sign a daily time sheet each time you report for work? _____ Do you ever sign your time sheet before it is complete? _____ Have you had any problems with your paycheck? _____ If yes, how long did it take to correct the problem? _____

16. Did you have any problems getting certified for the youth program? _____ If yes, please explain: _____

17. Do you know what your rights are? _____ Do you know where the Equal Opportunity Poster is located? _____

18. Do you have any comments you want to make: _____

Additional comments or observations: _____

Monitor: _____ Date: _____

SUPERVISOR INTERVIEW/WORK/TRAINING SITE REVIEW FORM

Work/Training Site: _____ Location: _____

Supervisor: _____ Participant(s): _____

Worksite Status: ☐ YOUTH ☐ ADULT ☐ DLW

1. Are you familiar with the Work-Site Agreement and do you know where it is? _____
2. If applicable, are you familiar with the Child Labor Laws for 14-17 year olds? _____
3. Did you receive orientation on the Youth Program and information on how the time sheets and sign-in sheets are to be completed? _____
4. Are the participants ever asked to sign blank time sheets? _____
5. How many hours per week do the participants work? _____
6. Do participants have supervision at all times? _____
7. Is there enough work to keep the participants busy? _____
8. What type of work do the participants perform? _____
9. Are the working conditions safe? _____
10. Have any of the participants had an accident? _____
11. Have you had any problems with any of the participants (i.e., discipline, work habits, etc.)? _____
If yes, please explain: _____
12. Are any of the participants related to anyone at the work site? _____
13. Has any participant had any problems with their paychecks (i.e., getting them on time, check amount, etc)? _____
If yes, please explain: _____
14. Where is the EEO Poster located? _____

Items Reviewed/Observed: () Time Cards/Sign-in-Sheets () Work-Site Agreement
() EEO Poster () Supervision () Safety Measures Observed

Comments: _____

Monitor's Signature: _____ Date: _____

ATTACHMENT B-1

PROCUREMENT REVIEW GUIDELINES

The following guidelines will be followed to conduct the review of all Local Workforce Investment Area (LWIA)/Subrecipient procurement (including contract and subcontract level).

1. Obtain and review a copy of the LWIA's written Policies and Procedures regarding procurement.
2. Identify the LWIA's small purchase limit: _____
3. Verify that the LWIA's written procurement policies and procedures contain the following requirements:
 - a. A code of conduct for employees conducting procurements, including criteria regarding conflict of interest
 - b. A process for avoiding purchasing unnecessary or duplicative items
 - c. A process for resolving disputes, claims, and protest of awards
 - d. All procurements are conducted in a fair and open manner
 - e. Various types of procurement including when and how to use them
 - f. Solicitation of small and minority firms, women's business enterprise and labor surplus area firms
 - g. A cost price analysis
 - h. An awarding agency review
 - i. Bonding requirements
 - j. Compliance with contract provisions, e.g., termination, equal opportunity, etc.
4. The Monitor will complete the exercises below for procurement transactions paid for in whole or in part with WIA funds:

METHODS OF PROCUREMENT (*Selection of a minimum of two transactions for each of the following procurement methods will be completed*):

- a. **SMALL PURCHASES**
Use 2 Small Purchase worksheets (Procurement Tool 1 - to record the Outcomes)
- b. **NONCOMPETITIVE PROPOSAL/SOLE SOURCE**
Use 2 Noncompetitive Proposal/Sole Source worksheets (Procurement Tool 2 - to record the outcomes)
- c. **SEALED BID/INVITATION FOR BID (IFB)**
Use 2 IFB worksheets (Procurement Tool 3 - to record the outcomes)
- d. **COMPETITIVE PROPOSAL/REQUEST FOR PROPOSAL (RFP)**
Use 2 RFP worksheets (Procurement Tool 4 to record the outcomes)

CONTRACT AGREEMENT *(If the Administrative Entity/Grant Recipient (or the contractor/subcontractor) signed a contract during the program year, for each of the procurement methods above, the monitor will record the outcomes on the Contract Review Worksheet (using Procurement Tool 5A Government or Procurement Tool 5B Non-governmental) for each procurement method used. However, if the LWIA uses only one contract agreement template for all procurement transactions, the monitor will complete only one Contract Review Worksheet.*

[References: 29 CFR Part 95, Section 95.41-47, 29 CFR Part 97, Section 97.36, WIA Directive 00-2, and Procurement and DOL Financial Management TAG Part II, Chapter II-10]

Monitor: _____ **Date:** _____ **Staff Interviewed:** _____

SMALL PURCHASE WORKSHEET:

PROCUREMENT TOOL 1

LWIA/Subgrantee:		
Staff Interviewed:	Date Reviewed:	
Amount of Purchase:	Date Purchased:	
Source of Purchase:		
Describe briefly the goods or services procured: _____		

If \$5,000 or more, was prior approval received?	Yes	No
For the purchase of equipment, did the Subgrantee determine that the purchase of this equipment is more cost effective than leasing?	Yes	No
Did the Subgrantee document the small purchase transaction by one of the following: sales receipt, current catalogs, or formal quotes? [Reference: 29 CFR 95.44 (a) (2) & 97.36 (b)(4)]	Yes	No
Did the Subgrantee obtain price or rate quotations from an adequate number of qualified sources? [Reference: 29 CFR 95.45 & 97.36(d)]	Yes	No
Did the Subgrantee perform a cost or price analysis? [Reference: 29 CFR 95.45 & 97.36 (f)]	Yes	No
Was the purchase made on the basis of full and open competition? [Reference: 29 CFR 95.43 & 97.36 (c)]	Yes	No
Does it appear that the small purchase was properly procured based on the information reviewed? If no, please explain. _____	Yes	No

Monitor: _____ Date: _____ Staff Interviewed: _____

PROCUREMENT TOOL 1A

If \$5,000 or more, was prior approval received?	Yes	No
For the purchase of equipment, did the Subgrantee determine that the purchase of this equipment is more cost effective than leasing?	Yes	No
For the purchase or improvement of Real Property, did the Subgrantee document that the purchase was for one of the following: [Reference: 20 CFR 667.260]	Yes	No
A. Improvements for physical and programmatic accessibility and reasonable accommodation as required by the Americans with Disabilities Act (ADA) of 1990 and the Rehabilitation Act of 1973, as amended.	Yes	No
B. To fund repairs, alterations, and capital improvements of SESA-owned real property or JTPA-owned property transferred to the WIA Title I program.	Yes	No
C. Job Corps facilities as authorized by the Secretary. [Reference: WIA section 160(3)(B)]	Yes	No
D. To fund disaster relief employment projects for demolition, cleaning, repair, renovation, and reconstruction of damaged and destroyed structures, facilities and lands located within a disaster area. [Reference: WIA sec. 173(d)]	Yes	No
Did the Subgrantee use the proper method of procurement? (Small purchase, Sole source, competitive bid, IFB/RFP) (Complete appropriate procurement tool.)	Yes	No
Did the Subgrantee perform a cost or price analysis? [Reference: 29 CFR 95.45 & 97.36 (f)]	Yes	No

Was the purchase made on the basis of full and open competition? [References: 29 CFR 95.43 and 97.36(c)]	Yes	No
Does it appear that the capital expenditure was properly procured based on the information reviewed? If no, please explain. _____ _____ _____ _____ _____	Yes	No

Monitor: _____ Date: _____ Staff Interviewed: _____

NON-COMPETITIVE PROPOSAL/SOLE SOURCE

PROCUREMENT TOOL 2

LWIA/Subgrantee:			
Staff Interviewed:		Review Date:	
Award Amount:		Agency Awarded:	
Goods or Services Procured:			
<p>Did the Subgrantee determine this award was not feasible under any other Procurement method? If yes, did the Subgrantee determine that one of the following circumstances applies:</p> <p><input type="checkbox"/> The item is only available from one single source.</p> <p><input type="checkbox"/> The public exigency or emergency for the requirement will not permit a delay resulting from the competitive solicitation.</p> <p><input type="checkbox"/> The awarding agency gave written authorization for noncompetitive proposals.</p> <p><input type="checkbox"/> After solicitation of a number of sources, competition is determined inadequate. [Reference: 29 CFR 95.44 (e)(2) & 97.36(d)(4)(i)(a-d)]</p>		Yes	No
<p>Did the Subgrantee conduct a cost or price analysis for this transaction? [Reference: 29 CFR 95.46 and 97.36(f)]</p>		Yes	No
<p>Did the LWIA/Subgrantee's procurement records include: [Reference: 29 CFR 95.46 & 97.36(b)(9)]</p>	The rationale for selecting this method of procurement.	Yes	No
	Justification for lack of competition when competitive bids or offers are not obtained.	Yes	No
	The basis for contractor selection	Yes	No
	The basis for award cost or price	Yes	No
<p>Did the Subgrantee ensure that the award was not made to a debarred or suspended party? [Reference: 20 CFR 667.200(d), 29 CFR 95.13 & 97.35]</p>		Yes	No
<p>Was there a conflict of interest, real or apparent, in this procurement transaction? If yes, explain. [Reference: 29 CFR 95.42 97.36(b)(3)(i-iv)]</p>		Yes	No
<p>Was the sole source transaction properly procured based on the information reviewed? If no, please explain.</p>		Yes	No

Monitor: _____ Date: _____ Staff Interviewed: _____

SEALED BID/INVITATION FOR BID (IFB) PROCUREMENT TOOL 3

LWIA/Subgrantee:		Review Date:	
Staff Interviewed:		Agency Awarded:	
Award Amount:			
Goods or Services Procured:			
Did the Subgrantee document its rationale for selecting this method of procurement? [Reference: 29 CFR 97.36(b)(9) and WIA Directive 00-2]		Yes	No
Did the Subgrantee publicly advertise the solicitation? [Reference: 29 CFR 97.36(d)(2)(ii)(A)]		Yes	No
Did the IFB include full and clear definitions and descriptions of the goods or services to be procured? [Reference: 29 CFR 95.44(a)(3)(ii)(B)]		Yes	No
Did the Subgrantee retain copies of each bid received? Total number of bids received? _____		Yes	No
Were the bids opened publicly at the time and place stated in the solicitation? [Reference: 29 CFR 97.36(d)(2)(ii)(C)]		Yes	No
Did the Subgrantee state its right in the IFB to reject any or all bids due to unresponsiveness?		Yes	No
If yes, did the Subgrantee reject any or all the bids received?		Yes	No
Did the Subgrantee document the specific reasons for rejecting any or all the bids? [Reference: 29 CFR 95.43 & 97.36 (d)(2)(ii)(E)]		Yes	No
Did the Subgrantee perform a written determination of demonstrated performance for this procurement transaction addressing the following? [Reference: 29 CFR 95.44(d) & 97.36(b)(8)]		Yes	No
<input type="checkbox"/> Contractor Integrity <input type="checkbox"/> Compliance with Public Policy <input type="checkbox"/> Record of Past Performance <input type="checkbox"/> Financial & Technical Resources			
Did the Subgrantee award the contract to the lowest bidder who met the technical requirements/specifications? [Reference: 29 CFR 97.36(d)(2)(ii)(D)]		Yes	No
Did the Subgrantee ensure that the award was not made to a debarred or suspended party? [Reference: 29 CFR 667.200(d), 29 CFR 95.13 & 97.35]		Yes	No

Was there a conflict of interest, real or apparent, with this procurement transaction? [Reference: 29 CFR 95.43 and 97.36(c)]	Yes	No
Did there appear to be any situations considered to be restrictive of competition regarding this procurement transaction? [Reference: 29 CFR 95.43 and 97.36 (c)]	Yes	No
Was the IFB procurement process properly conducted based on the information gathered? If no, please explain. _____ _____	Yes	No

Monitor: _____ Date: _____ Staff Interviewed: _____

COMPETITIVE PROPOSAL/REQUEST FOR PROPOSAL (RFP)

PROCUREMENT TOOL - 4

LWIA/SUBGRANTEE:			
Staff Interviewed:		Review Date:	
Award Amount:		Agency Awarded:	
Goods or Services Procured:			
Did the LWIA/Subgrantee document its rationale for selecting this method of procurement? [Reference: WIA Directive 00-2]			Yes No
Did the Subgrantee publicly advertise this RFP? [Reference: 29 CFR 97.36 (d)(3)(i)]			Yes No
Did the Subgrantee provide adequate response time for bidders?			Yes No
Did the RFP indicate the following:			Yes No
[Reference: 29 CFR 97.36(d)(3)(i)]		<ul style="list-style-type: none"> The scope of work and service area The method for evaluating the proposals The deadline for receipt The dispute process 	Yes No
Did the Subgrantee follow its procedures for proposal evaluation as specified in its written procurement procedures? [Reference: 29 CFR 95.44 and 97.36(d)(3)(iii)]			Yes No
Did the Subgrantee perform a cost or price analysis in connection with this procurement transaction? [Reference: 29 CFR 95.45 and 97.36(f)]			Yes No
Did the Subgrantee perform a written determination of demonstrated performance for this procurement transaction addressing the following: [References: 29 CFR 95.44(d) and 97.36(b)(8)]			Yes No
<input type="checkbox"/> Contractor Integrity <input type="checkbox"/> Compliance with Public Policy <input type="checkbox"/> Record of Past Performance <input type="checkbox"/> Financial & Technical Resources			Yes No
Did the Subgrantee ensure that the award was not made to a debarred or suspended party? [References: 29 CFR 667.200(d), 29 CFR 95.13 and 97.35]			Yes No
Was there a conflict of interest, real or apparent, with this procurement transaction? [References: 29 CFR 95.42 and 97.36(b)(3)(i-iv)]			Yes No

Did there appear to be any situations considered to be restrictive of competition regarding this procurement transaction? [References: 29 CFR 95.43 and 97.36(c)]	Yes	No
Was the RFP procurement process properly conducted based on the information gathered? If no, please explain. _____	Yes	No

Monitor: _____ Date: _____ Staff Interviewed: _____

CONTRACT REVIEW WORKSHEET

(Governmental)

PROCUREMENT TOOL 5A

LWIA/Subgrantee:		Review Date:	
Staff Interviewed:			
Type of Goods or Services Purchased:			
Procurement Method Used:		<input type="checkbox"/> IFB	<input type="checkbox"/> Sole Source <input type="checkbox"/> RFP
Source of Purchase:			
Purchase Amount:		Contract Period:	
Did the contract resulting from the procurement transaction specify the following: <i>(Check appropriate box)</i>			
• Administrative, contractual, or legal remedies in instances of contractual violation? (Contracts other than small purchases.) [Reference: 29 CFR 97.36(i)(1)]	Yes	No	
• Termination for cause or for convenience by the grantee or contractor? (All contracts in excess of \$10,000.) [Reference: 29 CFR 97.36(i)(2)]	Yes	No	
• Accordance with Title VI of the Civil Rights Act of 1964, and provisions of WIA Section 188 and compliance with Equal Employment Opportunity provisions in Executive Order (EO) 11246, as amended by EO 11375 and supplemented by the requirements of 41 CFR Part 60? [References: 20 CFR 667.200(f) and 29 CFR 97.36(i)(3)]	Yes	No	
• Notice of awarding agency requirements and regulations pertaining to reporting. [Reference: 29 CFR 97.36(i)(7)]	Yes	No	
• The DOL's requirements pertaining to patent rights with respect to any discovery or invention under this contract? [Reference: 29 CFR 97.36(i)(8)]	Yes	No	
• Awarding agency requirements and regulations pertaining to copyrights and rights in data? [References: 29 CFR 97.34 and 97.36(i)(9)]	Yes	No	
• The rights of the State, DOL, or any of their authorized representatives to access any books, records, papers or other pertinent documents for the purpose of auditing or monitoring? [Reference: 29 CFR 97.36(i)(10)]	Yes	No	
• The retention of all required records for 3 years? [Reference: 29 CFR 97.36(i)(11)]	Yes	No	

<ul style="list-style-type: none"> Compliance with all applicable standards, orders, or requirements issued under Section 306 of the Clean Air Act and Section 508 of the Clean Water Act (contracts in excess of \$500.01)? [Reference: 29 CFR 97.36(i)(12)] [Also reference the JTPA Manual, Part I, D2, Administrative Provision, dated June 22, 1994 - dollar limitations approved by the AWIB in May 2000.] 	Yes	No
<ul style="list-style-type: none"> For a non-governmental agency awarded a contract for \$500.01 or more, did the subcontractor certify that no funds shall be used for lobbying (Byrd-Anti Lobbying Amendment)? [Reference: 20 CFR 667.200(e) and 29 CFR 93.110] [Also reference the JTPA Manual, Part I, D2, Administrative Provision, dated June 22, 1994 - dollar limitations approved by the AWIB in May 2000.] 	Yes	No
<ul style="list-style-type: none"> Requiring compliance with the debarment and suspension requirements. [References: EO 12459 and 12689), 20 CFR 667.200(d), and 29 CFR Parts 97.35 and 98.510] 	Yes	No
<ul style="list-style-type: none"> Did the subcontractor sign a certification of a Drug Free Workplace or is it certified in the contract? [Reference: 20 CFR 667.200(d) and 29 CFR 98.600-630] 	Yes	No
<ul style="list-style-type: none"> Based on the above, did the Subgrantee include all required contract provisions and/or certifications? If no, please explain. [Reference: DOL Financial Management TAG, Ch.II-10-7] 	Yes	No

Monitor: _____

Date: _____

Staff Interviewed: _____

CONTRACT REVIEW WORKSHEET

(Non-governmental)

PROCUREMENT TOOL 5B

LWIA/Subgrantee:		Review Date:	
Staff Interviewed:			
Type of Goods or Services Purchased:			
Procurement Method Used:	<input type="checkbox"/> IFB	<input type="checkbox"/> Sole Source	<input type="checkbox"/> RFP
Source of Purchase:			
Purchase Amount:	Contract Period:		
Did the contract resulting from the procurement transaction specify the following: <i>(Check appropriate box.)</i>			
• Administrative, contractual, or legal remedies in instances of contractual violation (In excess of small purchase threshold)? [Reference: 29 CFR 95.48(a)]	Yes	No	
• Termination for cause of for convenience by the grantee or contractor (Contracts in excess of small purchase threshold)? [Reference: 29 CFR 95.48(b)]	Yes	No	
• The rights of the State, DOL, or any of their authorized representatives to access any books, records, papers, or other pertinent documents (records retention for 3 years) for the purpose of auditing or monitoring (In excess of small purchase threshold)? [Reference: 29 CFR 95.48(d) & 95.53]	Yes	No	
• Compliance with Equal Employment Opportunity provisions in the Executive Order (EO) 11246, as amended by EO 11375 and supplemented by the requirements of 41 CFR Part 60? [Reference: 29 CFR Parts 33, 37 and 95.48 Appendix A-1]	Yes	No	
• For the performance of experimental, developmental, or research work the DOL's requirements pertaining to patent rights, copyrights, and rights in data? [Reference: 29 CFR 95.36(a-d) and 95.48, Appendix A-5]	Yes	No	
• Compliance with all applicable standards, orders, or requirements issued under Section 306 of the Clean Air Act and Section 508 of the Clean Water Act (contracts in excess of \$500.01)? [Reference: 29 CFR 95.48 Appendix A-6] [Also reference the JTPA Manual, Part I, D2, Administrative Provision, dated June 22, 1994 - dollar limitations approved by the AWIB in May 2000.]	Yes	No	

<ul style="list-style-type: none"> For a contract for \$500.01 or more, did the subcontractor certify that no funds shall be used for lobbying (Byrd-Anti-Lobbying Amendment)? [Reference: 20 CFR 667.200(e), 29 CFR Parts 93 and 95.48 Appendix A-7] [Also reference the JTPA Manual, Part I, D2, Administrative Provision, dated June 22, 1994 - dollar limitations approved by the AWIB in May 2000.] 	Yes	No
<ul style="list-style-type: none"> Requiring compliance with the debarment and suspension requirements (EO 12459 and 12689)? [Reference: 20 CFR 667.200(d), 29 CFR Parts 95.13, 95.48 Appendix A-8 and 98.510] 	Yes	No
<ul style="list-style-type: none"> Did the subcontractor sign a certification of a Drug Free Workplace or is it certified in the contract? [Reference: 20 CFR 667.200(d) and 29 CFR 98.600-630] 	Yes	No
<ul style="list-style-type: none"> Based on the above, did the Subgrantee include all required contract provisions and/or certifications? If no, please explain. [Reference: DOL Financial Mgmt TAG, Ch II-10-7] 	Yes	No

Monitor: _____ Date: _____ Staff Interviewed: _____

PROPERTY MANAGEMENT

PROCUREMENT TOOL 6

1. Obtain a copy of the LWIA/Subgrantee's equipment records. Does the Subgrantee maintain equipment records that include the following data?

Data Element		Yes	No	Data Element		Yes	No
Description				Acquisition Date			
Serial Number				Acquisition Cost			
Funding Source				Location of Equipment			
Title Holder				Use and Condition of Equipment			
Percentage of Federal Participation				Ultimate Disposition Data			

2. Physically verify a sample of 10 pieces of equipment. (**Note:** Consider the location and cost of equipment in your selection.) Review for recent procurements of \$5000 or more needing prior approval.
3. Is a physical inventory of equipment conducted and are the results reconciled with the property records at least once every two years? ☐ Yes ☐ No
4. Does it appear that equipment purchased with WIA funds is used for WIA service delivery purposes? ☐ Yes ☐ No
5. Does it appear that adequate maintenance procedures are in place to keep equipment in good condition? ☐ Yes ☐ No
6. Does it appear that the control system is adequate to safeguard the property from loss, damage, or theft? ☐ Yes ☐ No
7. Is the Subgrantee's property disposition policy consistent with Federal regulations? ☐ Yes ☐ No

[References: 29 CFR Part 95, Section 95.34 and 29 CFR Part 97, Section 97.3]

Monitor: _____ Date: _____ Staff Interviewed: _____

WIA FINANCIAL MONITORING INSTRUMENT – SECTION B

SUBRECIPIENT/LOCAL AREA: _____

DATE(S) OF ON-SITE REVIEW: _____

MONITOR(S) CONDUCTING REVIEW: _____

SUBGRANTS REVIEWED: _____

TITLE: _____

SUBGRANT NUMBER: _____

SUBGRANT AMOUNT: _____

START/END DATE: _____

TITLE	SUBGRANT NUMBER	SUBGRANT AMOUNT	START/END DATE

PL = Public Law 105-220
 N/A = Not Applicable
 WIA = Workforce Investment Act
 W/P REF = Work Paper Reference

REFERENCE	REVIEW ITEM	YES	NO	N/A	W/P REF
ACCOUNTING SYSTEMS/CONTROLS					
WIA Sec. 185 (a)(1)	1. Does the subrecipient's accounting system provide for identification, receipt, and expenditure of funds for each subgrant by year of appropriation and applicable cost categories/components?				
WIA Sec. 185 (a)(1)	2. Are the subrecipients' accounting records maintained in a manner to facilitate the tracking of funds to source documents?				
WIA Sec. 184 (a)(1)	3. Does the subrecipient have written accounting procedures? (Obtain and review.)				
	a. Are procedures updated as needed?				
	b. Are procedures being utilized by appropriate staff?				
WIA Sec. 184 (a)(1)	4. Does subrecipient have a system in place to ensure report and payment due dates for financial reports, taxing agencies, insurance companies, etc., are met?				
WIA Sec. 184 (a)(1)	5. Does the subrecipient's accounting system provide for:				
	a. Chart of accounts?				
	b. Fixed assets accounts?				
	c. Cash receipts journal?				

REFERENCE	REVIEW ITEM	YES	NO	N/A	W/P REF
	d. Cash disbursements journal?				
	e. General journal?				
	f. General ledger?				
	g. Subsidiary ledgers?				
WIA Sec. 184 (a)(1)	6. Does subrecipient's chart of accounts appear to be customary accounts and include all categories/components by which costs are reported?				
WIA Sec. 184 (a)(1)	7. Does subrecipient prepare monthly trial balances?				
WIA Sec. 184 (a)(1)	8. Has subrecipient retained all financial records and supporting documentation for the period of time required by the GAE?				
FINANCIAL REPORTS					
20 CFR 667.300 (a)(3) and Federal Register Vol. 65 No. 156	1. Are the subrecipient's Monthly Financial Reports prepared on an accrual basis for each active grant title as required by the GAE? Does the subrecipient have an approved Budget? Are actual expenditures compared to budgeted expenditures monthly?				
20 CFR 667.300 (a)(3) and Federal Register Vol. 65 No. 156	2. If a subrecipient reports on a cash basis, except for quarter- ending reporting periods, is a worksheet prepared to get from cash to an accrual basis? If no, please explain subrecipient's method of developing accruals: _____				

REFERENCE	REVIEW ITEM	YES	NO	N/A	W/P REF
	<p>_____</p> <p>_____</p> <p>Review supporting documentation for subrecipient's latest quarter-ending Monthly Financial Report(s) to verify development of accruals.</p> <p>3. If subrecipient reports on an accrual basis monthly, are accruals entered in subrecipient's books of account?</p> <p>If yes, when are accruals reversed? _____</p> <p>_____</p> <p>Explain subrecipient's method of developing accruals.</p> <p>_____</p> <p>_____</p> <p>_____</p>				
20 CFR 667.300 (a)(3) and Federal Register Vol. 65 No. 156					
20 CFR 667.300 (c)(2) and Federal Register Vol. 65 No. 156	<p>4. Are Monthly Financial Reports prepared from subrecipient's books of account?</p> <p>If no, explain subrecipient's method of preparing reports.</p> <p>_____</p> <p>_____</p> <p>Using supporting documentation, reconstruct subrecipient's latest Monthly Financial Report(s) to verify accuracy.</p>				
WIA Sec. 185 (e)(1)	5. Are Monthly Financial Reports being prepared by program year of appropriation for all applicable subgrants?				
WIA Sec. 185 (f)(2)	6. If subrecipient is reporting "Stand-In Costs", are records being maintained separately for these costs at the program year/category levels for applicable titles?				

REFERENCE	REVIEW ITEM	YES	NO	N/A	W/P REF
	Using supporting documentation, verify amount(s) of "Stand-In Costs" reported on subrecipient's latest Monthly Financial Report(s).				
20 CFR 667.300 (a)(b) Federal Register	<p>7. Are Monthly Financial Reports being submitted to the GAE on a timely basis?</p> <p>Review all current-year reports to verify reports were received by the GAE no later than the 15th of the month.</p> <p>Note exceptions. _____</p> <p>_____</p> <p>_____</p>				

CASH RECEIPTS

WIA, Sec. 185 (1)	<p>1. Does subrecipient maintain a log on all funds received?</p> <p>a. Is the log maintained by person(s) not responsible for maintaining accounting records?</p> <p>b. Is the log verified with bank reconciliations?</p>				
WIA, Sec. 185 (1)	2. Are checks restrictively endorsed by person(s) opening the mail?				
WIA, Section 185 (1)	<p>3. Are all receipts required to be recorded promptly and checks deposited daily or at appropriate regular intervals?</p> <p>Describe the process followed: _____</p> <p>_____</p> <p>_____</p>				

REFERENCE	REVIEW ITEM	YES	NO	N/A	W/P REF
WIA, Sec 185 (1)	4. Select a sample of cash receipt journal entries and determine if entries: <ul style="list-style-type: none"> a. Can be traced to bank deposit slips? b. Can be traced to the subrecipient's books of account? 				
WIA, Sec. 185 (1)	5. Does subrecipient's most recent cash request: <ul style="list-style-type: none"> a. Agree with GAE's corresponding cash disbursement to subrecipient? b. Trace to cash receipts journal entries? 				
CASH DISBURSEMENTS					
WIA, Sec. 184 (a)(1)	1. Does subrecipient maintain a cash disbursements system which provides for the following: <ul style="list-style-type: none"> a. Use of sequentially pre-numbered checks? b. Safeguarding of blank checks to prevent unauthorized access? c. Safeguarding of mechanical check signers and signature stamps? d. Prohibiting the drawing of checks payable to cash? e. Prohibiting the signing of checks in advance? f. Authorizing documentation accompanying all checks presented for signature? 				

REFERENCE	REVIEW ITEM	YES	NO	N/A	W/P REF
	g. Requiring more than one signature? h. Requiring check-signing authority, when two signatures are required, to at least one person not having responsibility for maintaining accounting records? I. Retaining voided checks along with information concerning possible future claims, if applicable?				
WIA, Sec. 184 (a)(1)	2. Does subrecipient have written policies supporting check payment procedures?				
WIA, Sec. 184 (a)(1)	3. Select a sample of cash disbursements journal entries and determine if: a. Entries can be traced to the subrecipient's books of account? b. Payments can be traced to source documentation and appear to be for usual transactions. c. Payments have been charged to appropriate program year, title(s), and categories/components?				
WIA, Sec. 184 (a)(1)	4. Does the subrecipient have written policies concerning use of company credit cards? Select a sample of credit card vouchers and determine if: a. Credit card vouchers correspond to supporting documentation and cancelled checks?				

REFERENCE	REVIEW ITEM	YES	NO	N/A	W/P REF
	b. Credit card payment procedures are consistent with credit card policy?				
Federal Register Vol. 65 No. 156 and 667.220 (ix), (4)	5. Does subrecipient have a written travel policy, which meets GAE requirements?				
Federal Register Vol. 65 No. 156 and 667.220 (ix), (4)	6. Select a sample of travel vouchers and determine if: a. Travel vouchers correspond to supporting documentation and cancelled checks? b. Travel payment procedures are consistent with travel policy?				
WIA, Sec. 184 (a)(1)	7. Does subrecipient have a system in place to ensure long-distance telephone calls to programs that relate only to WIA activities? Describe system: _____				
PETTY CASH					
WIA, Sec. 184 (a)(2)(A)	1. Does subrecipient maintain a petty cash fund, which includes WIA funds?				
WIA, Sec. 184 (a)(2)(A)	2. If yes, what is the amount specified for this fund? \$ _____				
WIA, Sec. 184 (a)(2)(A)	3. What is the current balance in the fund? Balance: \$ _____ Date: _____				

REFERENCE	REVIEW ITEM	YES	NO	N/A	W/P REF
WIA, Sec. 184 (a)(2)(A)	4. Who is the designated petty cash custodian? Name: _____ Title: _____				
WIA, Sec. 184 (a)(2)(A)	5. Does subrecipient maintain a petty cash system which provides for: a. Emergency or incidental use only? b. Well-documented disbursements? c. Pre-numbered petty cash slips? d. Monthly reconciliations? _____ If not, how often? _____				
CASH MANAGEMENT/EXCESS CASH					
WIA, Sec. 184 (a)(1)	1. Does subrecipient have controls in place to ensure that cash on hand does not exceed immediate needs? Describe system: _____ _____ _____ _____				
WIA, Sec. 184 (a)(1)	2. Does subrecipient maintain a daily cash flow ledger or worksheet reflecting daily cash receipts, disbursements, and cash balances for each WIA program/title as well as for total WIA funds?				

REFERENCE	REVIEW ITEM	YES	NO	N/A	W/P REF
WIA, Sec. 184 (a)(1)	3. Does subrecipient have procedures in place to ensure that cash requests do not exceed the amounts of funds awarded the subrecipient by the State for all WIA programs?				
WIA, Sec. 184 (a)(1)	4 Do these procedures provide for the prompt return of unneeded funds to the GAE?				
WIA, Sec. 184 (a)(1)	5 Does subrecipient monitor its subcontractors on an ongoing basis to control excess cash at that level? Specify method(s) utilized to control excess cash at the subcontractor level (delaying cash requests, adjusting amounts requested, reimbursement rather than advance payment basis, other). _____ _____ _____				
WIA, Sec. 184 (a)(1)	6. Does subrecipient request cash for payroll-withholding items (FICA, insurance, Federal and State taxes) based only on the actual dates on which payment must be made?				
WIA, Sec. 184 (a)(1)	7. Complete the excess cash analysis worksheets for a selected period of time to determine whether subrecipient's cash on hand is within allowable limits for all WIA programs. NOTE: If subrecipient is reporting program income, the subrecipient's program income balance(s) must be included as cash on hand for the time period for which cash analysis worksheets are prepared.				

REFERENCE	REVIEW ITEM	YES	NO	N/A	W/P REF
BANK RECONCILIATIONS					
WIA, Sec. 184 (a)(1)	1 Is subrecipient preparing monthly bank reconciliations for all WIA accounts? Determine number of WIA bank accounts. _____ Obtain copies of latest completed bank reconciliations.				
WIA, Sec. 184 (a)(1)	2. Are bank reconciliations current? If not, how many months are they behind? _____				
WIA, Sec. 184 (a)(1)	3. Do bank reconciliations itemize outstanding checks?				
WIA, Sec. 184 (a)(1)	4. Does subrecipient have procedures for canceling outstanding checks, which have become outdated?				
WIA, Sec. 184 (a)(1)	5. Do bank reconciliations trace to subrecipient's books of account? If not, note any exceptions. _____ _____				
WIA, Sec. 184 (a)(1)	6. Are bank reconciliations prepared by person(s) not responsible for handling cash and/or signing checks?				
PAYROLL SYSTEM					
WIA, Sec. 184 (a)(1) and OMB Circular A-87 p18 Sec. H	1. Does the subrecipient's payroll system provide for: a. Payrolls based on time and attendance reports? b. Payrolls certified by management: 1) For accuracy?				

REFERENCE	REVIEW ITEM	YES	NO	N/A	W/P REF
	<p>2) That all payees are bona fide staff or participants?</p> <p>c. Staff and participants paid only by check?</p> <p>d. Preparation of payrolls entirely separate from and independent of the delivery of paychecks?</p> <p>e. Distribution of paychecks made by person(s) not involved in timekeeping or bank reconciliation work?</p>				
WIA, Sec. 184 (a)(1) and OMB Circular A-87 p18 Sec. H	2. Does subrecipient have written policies supporting payroll procedures?				
WIA, Sec. 184 (a)(1) and OMB Circular A-87 p18 Sec. H	3. Does subrecipient have written procedures for handling: <p>a. Unclaimed participant checks?</p> <p>b. Lost, stolen, or missing checks?</p> <p>c. Payroll complaints?</p>				
WIA, Sec. 184 (a)(1) and OMB Circular A-87 p18 Sec. H	4. Does subrecipient maintain staffs' leave records, which reflect cumulative sick, annual, and compensatory time accrued and taken?				
WIA, Sec. 184 (a)(1) and OMB Circular A-87 p18 Sec. H	5. Select a sample of payroll register entries for both staff and participants, review cancelled checks, and determine if: <p>a. Entries can be traced to staff and participant timesheets?</p> <p>b. Cumulative leave records for sampled individuals agree with timesheets?</p>				

REFERENCE	REVIEW ITEM	YES	NO	N/A	W/P REF
	c. Only authorized persons endorse checks?				
BONDING/INSURANCE					
OMB Circular A-122 (18) and OMB Circular A-87 (B)(C)	1. Are subrecipient's employees who are responsible for handling WIA funds, either directly or indirectly, covered under fidelity bonds?				
OMB Circular A-122 (18) and OMB Circular A-87 (B)(C)	2. Are subrecipient's employees and eligible participants covered under the State Workers' Compensation law?				
OMB Circular A-87 (B)(C)	3. Has subrecipient secured insurance coverage for injuries suffered by participants not covered under the State Workers' Compensation?				
OMB Circular A-87 (B)(C)	4. Does subrecipient have adequate liability insurance coverage for all staff and/or participants operating vehicles for WIA purposes?				
OMB Circular A-87 (B)(C)	5. Has subrecipient secured insurance coverage for its non-expendable property?				
OMB Circular A-87 (B)(C)	6. Has subrecipient ensured that all its WIA bank accounts have FDIC coverage?				
OMB Circular A-110 (22)(i)(2)	7. Have subrecipient bank balances in excess of FDIC coverage (\$100,000) been collaterally secured? Amount of collateralization: \$ _____				

REFERENCE	REVIEW ITEM	YES	NO	N/A	W/P REF
PROPERTY MANAGEMENT/LEASES					
OMB Circular A-110 (.34)(3)(.53)	1. Does subrecipient make periodic physical inventories of all property? a. By whom? _____ b. How often? _____ c. Are differences reconciled?				
OMB Circular A-110 (.34)(2)	2. Does subrecipient maintain property records for its nonexpendable property, including identification tag numbers, as required by the GAE?				
OMB Circular A-110 (.34)(4)	3. Has subrecipient established and implemented written procedures to account for lost, stolen, or damaged property?				
OMB Circular A-110 (.34)(6)(g)	4. If subrecipient disposed of any property during the current year, were the GAE's disposition guidelines followed?				
OMB Circular A-122 (13)(43)	5. Do all lease agreements for building space and equipment comply with GAE specifications? Obtain all current lease agreements and review. Verify that a sample of lease/rent payments recorded in the cash disbursements journal agrees with costs stipulated in the lease agreements.				
PROGRAM INCOME					
Federal Register 29CFR 95.24 or 29 CFR 97.25 (g)(2)	1. Has subrecipient generated WIA program income during current program/fiscal year? If yes, specify subgrant(s)				

REFERENCE	REVIEW ITEM	YES	NO	N/A	W/P REF
	and amount(s): _____ _____ _____				
WIA Sec. 195 (7)(A) and (B)	<p>2. Has subrecipient submitted a Program Income Report to the GAE for each quarter during which program income was earned and/or expenditures were incurred for all applicable subgrants? If yes, review subrecipients records to determine if:</p> <p>a. Program income is being accounted for as a separate funding source for each applicable subgrant?</p> <p>b. Amounts of program income earned and/or expended during the current program/fiscal year agree with amounts reported to the GAE for the same time period?</p> <p>c. Program income is being utilized to further the program objectives of the WIA subgrant under which the program income was earned?</p> <p>d. Program income expenditures are being accounted for and reported by appropriate cost categories?</p>				
WIA Sec. 195 (7)(B)(iii)	<p>3. Has subrecipient earned interest on advances of WIA funds during the current program/fiscal year? If yes, specify subgrant(s): _____ _____</p>				
WIA Sec. 195 (7)(B)(iii)	<p>4. Has subrecipient accounted for interest earned on WIA funds as program income as required?</p>				

REFERENCE	REVIEW ITEM	YES	NO	N/A	W/P REF
	<p>4. Have all collections or adjustments been made during this agreement?</p> <p>(Sample up to five payment or adjustment documentations.)</p> <p>_____</p> <p>_____</p> <p>_____</p>				
INTERNAL COST ALLOCATION					
WIA, Sec. 184 (a)(2) and OMB Circular A-87	<p>1. Does subrecipient have an approved indirect cost rate or cost allocation plan for reporting costs, which are jointly shared by different funding sources and/or WIA titles? If yes, which costs are shared (salaries and benefits, building space and utilities, office supplies and equipment, travel, etc.)?</p> <p>_____</p> <p>_____</p> <p>_____</p>				
WIA, Sec. 184 (a)(2) and OMB Circular A-87	<p>2. Does subrecipient have written procedures for identifying, accumulating, and allocating costs between funding sources/WIA titles and applicable cost categories for those costs incurred for common or joint purposes benefiting more than one cost objective?</p> <p>Is there written evidence such as timesheets that costs being allocated to the grant are being treated consistently over time and within the accounting system, are necessary and reasonable, and are being allocated to the grant based on benefits received?</p>				

REFERENCE	REVIEW ITEM	YES	NO	N/A	W/P REF
	Describe subrecipient's cost allocation method(s): _____				
WIA, Sec. 184 (a)(2) and OMB Circular A-87	3. What method(s) of shared administrative costs allocation is being used by the subrecipient during the current program/fiscal year (Cost pool, provisional rate adjusted to actual, predetermined rates, other)? _____ _____				
WIA, Sec. 184 (a)(2) and OMB Circular A-87	4. Does the subrecipient's procedures for allocating costs among the subrecipient's various funding sources/WIA titles result in allocated costs, which appear to be fair and reasonable? Note any exceptions. _____ _____				
COST LIMITATIONS					
20 CFR 667.210 (a-c) and Federal Register Vol. 65 No. 156	1. Does subrecipient have procedures in place to monitor expenditure/funds availability data on a continuing basis to ensure compliance with applicable cost limitations for each of its WIA programs by year of appropriation? Describe subrecipient's method of monitoring cost limitations. Does it appear adequate and are established procedures being followed? _____ _____ _____ _____				

REFERENCE	REVIEW ITEM	YES	NO	N/A	W/P REF
20 CFR 667.210 (a-c) and Federal Register Vol. 65 No. 156	<p>2. Does subrecipient prepare a separate cost limitations report based on reported expenditures each month? If yes, obtain and review copy of latest report. Note any possible problems foreseen regarding over/under expenditure levels.</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>				
	<p>3. Has subrecipient reported administrative costs attributed to WIA funds in excess of the 10% limit?</p> <p>If yes, indicate subgrant(s) to which exception is applicable:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>				
AUDIT					
20 CFR 667.200 (b) and Federal Register Vol. 65 No. 156	1. Is subrecipient required to have an A-128 or A-133 audit?				
20 CFR 667.200 (b) and Federal Register Vol. 65 No. 156	2. Has subrecipient had a formal audit conducted within the past year?				
20 CFR 667.500, 20 CFR 667.505, 20 CFR 667.510, and Federal Register Vol. 65 No. 156	3. Was subrecipient's audit secured according to GAE's procurement policies? Review audit selection documentation.				

REFERENCE	REVIEW ITEM	YES	NO	N/A	W/P REF

20 CFR 667.500, 20 CFR 667.505, 20 CFR 667.510, and Federal Register Vol. 65 No. 156	4. Did subrecipient receive acceptance of its latest audit from its cognizant agency?				
20 CFR 667.500, 20 CFR 667.505, 20 CFR 667.510, and Federal Register Vol. 65 No. 156	5. Were there any questioned/disallowed costs in subrecipient's last audit? Amount of questioned/disallowed costs: \$ _____ Amount unresolved: \$ _____				
20 CFR 667.500, 20 CFR 667.505, 20 CFR 667.510, and Federal Register Vol. 65 No. 156	6. If subrecipient's latest audit was an A-133 audit, did subrecipient receive a separate management letter disclosing nonmaterial findings? If yes, obtain copy and review to ensure appropriate corrective action has been taken.				
20 CFR 667.500, 20 CFR 667.505, 20 CFR 667.510, and Federal Register Vol. 65 No. 156	7. If corrective action was stipulated during the GAE's resolution of subrecipient's previous year's audit, has such action been taken by subrecipient? If no, please explain: _____ _____ _____				
20 CFR 667.500, 20 CFR 667.505, 20 CFR 667.510, and Federal Register Vol. 65 No. 156	8. Does subrecipient have procedures in place to correct audit findings?				

REFERENCE	REVIEW ITEM	YES	NO	N/A	W/P REF
20 CFR 667.500, 20 CFR 667.505, 20 CFR 667.510, and Federal Register Vol. 65 No. 156	<p>9. Has subrecipient established procedures to ensure its subcontractors covered by A-133 have had such audits conducted and that subrecipient receives and resolves these audits within the required 180-day timeframe?</p> <p>NOTE: If subrecipient has any subcontractor audits in current audit resolution, review resolution files to ensure proper procedures are being followed. Note any exceptions.</p>				
PROCUREMENT					
29 CFR Part 95, Section 95.41-95.47, 29 CFR Part 97, Section 97.36, WIA Directive 00-2 Procurement, and DOL Financial Management TAG Part II, Chapter II-10	<p>1. Did subrecipient have any procurement(s) during the current year?</p> <p>If yes, complete procurement attachment B-1.</p>				
INCIDENT REPORTING					
WIA Directive 02-3 Incident Reporting	<p>1. Does the subgrantee have written internal management procedures related to preventing and detecting fraud, waste, abuse, or other criminal activity?</p> <p>If not, how does it ensure allegations are recognized, detected and reported to the Office of Inspector General and The Compliance Review Division?</p>				

REFERENCE	REVIEW ITEM	YES	NO	N/A	W/P REF
	<p>2. How does the subgrantee ensure that its subrecipients (including the One-Stop Operator) are aware of their responsibilities?</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>				

SIGN-IN SHEET

(ATTACH ADDITIONAL SHEETS IF NECESSARY)

For The _____ Arkansas

(ENTER GEOGRAPHICAL AREA/LOCAL WORKFORCE INVESTMENT AREA NAME)

Date: _____

[illegible]

(Use additional sheets if necessary.)

DATE OF REVIEW: _____

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.